

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

## In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*Twenty-Three (23) Discord Accounts, hosted at the  
premises controlled, or operated by Discord, Inc, a  
company headquartered in San Francisco, California.

Case No. MJ24-089

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Twenty-Three (23) Discord Accounts, hosted at the premises controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

located in the Western District of Washington, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18 U.S.C. § 2422(b)

Offense Description

Enticement of Children and Attempted Enticement of Children

The application is based on these facts:

- ☒ See Affidavit of Special Agent Alaina Dussler, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



Applicant's signature

Alaina Dussler, Special Agent (HSI)

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 02/16/2024



Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge

Printed name and title

**AFFIDAVIT OF SPECIAL AGENT ALAINA DUSSLER**

STATE OF WASHINGTON )

) ss

COUNTY OF SNOHOMISH )

**AFFIANT BACKGROUND**

I, Alaina Dussler, a Special Agent with Homeland Security Investigations (HSI) in Seattle, Washington, having been first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND PURPOSE OF AFFIDAVIT**

1. I make this affidavit in support of an application for a search warrant for information associated with certain Discord accounts that are stored at premises owned, maintained, controlled, or operated by Discord, Inc. ("Discord"), a company headquartered in San Francisco, California. The information to be searched is described in the following paragraphs and in Attachments A1 through A23. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Discord to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the account.

2. I am a Special Agent ("SA") with the Department of Homeland Security ("DHS"), U.S. Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"). I have held such a position since December 2021. HSI is responsible for enforcing the customs and immigration laws and federal criminal statutes of the United States. I am currently assigned to the Office of the Special Agent in Charge ("SAC"), Seattle, Washington, and am a member of the Child Exploitation Investigations Group. As part of my current duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography and material involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252, and

1 2252A. I have also had the opportunity to observe and review examples of child  
2 pornography (as defined in 18 U.S.C. § 2256(8)).

3 3. As part of my current duties as an HSI Criminal Investigator, I investigate  
4 criminal violations relating to child exploitation and child pornography including  
5 violations of Title 18, United States Code, Sections 2251(a), 2252(a)(2), 2252(a)(4)(B),  
6 and 2243(a)(1). I have received training about child pornography and child exploitation,  
7 and have observed and reviewed numerous examples of child pornography in various  
8 forms of media, including media stored on digital media storage devices such as  
9 computers, tablets, cellphones, etc. I am a graduate of the Criminal Investigator Training  
10 Program ("CITP"), and the HSI Special Agent Training ("HSISAT") at the Federal Law  
11 Enforcement Training Center in Glynco, Georgia. I have participated in the execution of  
12 previous search warrants, which involved child exploitation and/or child pornography  
13 offenses, and the search and seizure of computers, related peripherals, and computer  
14 media equipment. I am a member of the Seattle Internet Crimes Against Children Task  
15 Force ("ICAC"), and work with other federal, state, and local law enforcement personnel  
16 in the investigation and prosecution of crimes involving the sexual exploitation of  
17 children.

18 4. The facts in this affidavit come from my personal observations, my training  
19 and experience, and information obtained from other agents and witnesses. This affidavit  
20 is intended to show merely that there is sufficient probable cause for the requested  
21 warrants and does not set forth all of my knowledge about this matter.

22 Based on my training and experience and the facts as set forth in this affidavit, there is  
23 probable cause to believe that violations of 18 U.S.C. Section 2422(b), Enticement of  
24 Children and Attempted Enticement of Children, has been committed by Bennett Sung  
25 PARK. There is also probable cause to search the information described in Attachments  
26 A1 through A23, specifically:  
27

1           a.     **SUBJECT ACCOUNT 1:** Email: lylaflower49@gmail.com,  
2     Username: spacecowboy9261#0000 User ID number is 893028927956738089;

3           b.     **SUBJECT ACCOUNT 2:** Email: bennettspark@gmail.com,  
4     Username: MoonMan#4642 User ID: 432783654557843456;

5           c.     **MV1 ACCOUNT:** Username: baezy\_#0000, User ID:  
6     1052882529054642216;

7           d.     **MV2 ACCOUNT:** Username: mayoxhen#0000, User ID:  
8     711460293473075221;

9           e.     **MV3 ACCOUNT:** Username: luna9967#0000, User ID:  
10    895181087511298068;

11          f.     **MV4 ACCOUNT:** Username: prettygirl2#0000, User ID:  
12    826123343622176809;

13          g.     **MV 5 ACCOUNT:** Username: volietnce#0000, User ID:  
14    678711470497726485;

15          h.     **MV6 ACCOUNT:** Username: jo876543#0000, User ID:  
16    906379051550248971;

17          i.     **MV7 ACCOUNT:** Username: Deleted User d2c0a72c#7499, User  
18    ID: 1003928511490302002;

19          j.     **MV8 ACCOUNT:** Username: juliettqr#0000, User ID:  
20    1002455100930916432;

21          k.     **MV9 ACCOUNT:** Username: oakley73728#0000, User ID:  
22    901107917091143760;

23          l.     **MV10 ACCOUNT:** Username: sigsaftersex#0000, User ID:  
24    944945896842485810;

25          m.     **MV11 ACCOUNT:** Username: princessvi0let#0000, User ID:  
26    1005404868258840668;

27          n.     **MV14 ACCOUNT:** Username: Deleted User 1540e08b#6336, User  
  ID: 953067175936135178;

          o.     **MV15 ACCOUNT:** Username: selena0562#5935, User ID:  
  359171244014174217;

1 p. **MV16 ACCOUNT:** Username: Buttons#8174, User ID:  
804463761603821578;

2 q. **MV17 ACCOUNT:** Username: meisie#5714, User ID:  
3 617385349693571129;

4 r. **MV18 ACCOUNT:** Username: \_moonplayz\_#0000, User ID:  
5 474369899196710912;

6 s. **MV19 ACCOUNT:** Username: netz#4199, User ID:  
7 535659168410107906;

8 t. **MV20 ACCOUNT:** Username: charityy#0000, User ID:  
9 544537243755479050;

10 u. **MV21 ACCOUNT:** Username: vars0n#0000, User ID:  
486332388742529025;

11 v. **MV22 ACCOUNT:** Username: Deleted User 0c25c2aa#5200, User  
12 ID: 555186377029844992; and

13 w. **MV23 ACCOUNT:** Username: semyetra#0000, User ID:  
14 272623738695188481

15 for evidence of these crimes and contraband or fruits of these crimes, as described in  
16 Attachments B1 through B23.

### 17 **DEFINITIONS**

18 The following definitions apply to this affidavit:

19 5. “Chat,” as used herein, refers to any kind of text communication over the  
20 internet that is transmitted in real-time from sender to receiver. Chat messages are  
21 generally short in order to enable other participants to respond quickly and in a format  
22 that resembles an oral conversation. This feature distinguishes chatting from other text-  
23 based online communications such as internet forums and email.

24 6. For the purposes of this affidavit, a “minor” refers to any person less than  
25 eighteen years of age and for the purpose of this search warrant, “Child pornography,” as  
26 used herein, is defined in 18 U.S.C. § 2256 (any visual depiction of sexually explicit  
27

1 conduct where (a) the production of the visual depiction involved the use of a minor  
2 engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer  
3 image, or computer-generated image that is, or is indistinguishable from, that of a minor  
4 engaged in sexually explicit conduct, or (c) the visual depiction has been created,  
5 adapted, or modified to appear that an identifiable minor is engaged in sexually explicit  
6 conduct).

7 7. “Sexually explicit conduct” means actual or simulated (a) sexual  
8 intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons  
9 of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic  
10 abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. See 18  
11 U.S.C. § 2256(2).

12 8. “Cloud-based storage service,” as used herein, refers to a publicly  
13 accessible, online storage provider that collectors of depictions of minors engaged in  
14 sexually explicit conduct can use to store and trade depictions of minors engaged in  
15 sexually explicit conduct in larger volumes. Users of such a service can share links and  
16 associated passwords to their stored files with other traders or collectors of depictions of  
17 minors engaged in sexually explicit conduct in order to grant access to their collections.  
18 Such services allow individuals to easily access these files through a wide variety of  
19 electronic devices such as desktop and laptop computers, mobile phones, and tablets,  
20 anywhere and at any time. An individual with the password to a file stored on a cloud-  
21 based service does not need to be a user of the service to access the file. Access is free  
22 and readily available to anyone who has an internet connection.

23 9. “Computer,” as used herein, refers to “an electronic, magnetic, optical,  
24 electrochemical, or other high speed data processing device performing logical or storage  
25 functions, and includes any data storage facility or communications facility directly  
26 related to or operating in conjunction with such device,” including smartphones and  
27 mobile devices.

1           10.     “Data,” as used herein refers to the quantities, characters, or symbols on  
2 which operations are performed by a computer, being stored and transmitted in the form  
3 of electrical signals and recorded on magnetic, optical, or mechanical recording media.

4           11.     “Digital Devices” as used herein refers to any physical object that has a  
5 computer, microcomputer, or hardware that is capable of receiving, storing, possessing,  
6 or potentially sending data.

7           12.     “File Transfer Protocol” (“FTP”), as used herein, is a standard network  
8 protocol used to transfer computer files from one host to another over a computer  
9 network, such as the internet. FTP is built on client-server architecture and uses separate  
10 control and data connections between the client and the server.

11           13.     “Internet Service Providers” (“ISPs”), as used herein, are commercial  
12 organizations, community-owned, non-profit, or otherwise privately-owned companies  
13 that are in business to provide individuals and businesses access to the internet. ISPs  
14 provide a range of functions for their customers including access to the internet, web  
15 hosting, e-mail, remote storage, and co-location of computers and other communications  
16 equipment.

17           14.     “Mobile applications,” as used herein, are small, specialized programs  
18 downloaded onto mobile devices that enable users to perform a variety of functions,  
19 including engaging in online chat, reading a book, or playing a game.

20           15.     “Records,” “documents,” and “materials,” as used herein, include all  
21 information recorded in any form, visual or aural, and by any means, whether in  
22 handmade, photographic, mechanical, electrical, electronic, or magnetic form.

23           16.     “User Attributes,” as used herein refers to any tangible data, documents,  
24 settings, programs, or other information that provides information related to the identity  
25 of the specific user of the device, computer, application, program, or record.

26 //

27 //



**BACKGROUND**

Based on my training, experience and collaboration with agents and detectives investigating child exploitation, industry experts, academia and other law enforcement personnel, I know the following:

17. That adult persons with a sexual interest in minors are persons whose sexual targets are children. They receive sexual gratification and satisfaction from actual physical contact with children, fantasy involving the use of writings detailing physical contact with children, and/or from fantasy involving the use of pictures and/or videos of minors.

18. The development of the computer has changed the way children are engaged in sexually explicit conduct and the files created therefrom are distributed thereafter. The computer serves four functions in connection with depictions of children engaged in sexually explicit conduct. These four functions include: production, communications, distribution, and storage.

19. Pornographers produce both still and moving images, i.e.: photographs and video. These files can be transferred either directly from the camera/camera phone into a computer or mobile application, directly from a storage device such as a flash drive to a computer, or the image files can be transferred directly into the computer by use of a scanner.

20. In addition to data sharing between phones, mobile and desktop applications, and websites, e-mail may also be used electronically transmits files through a user's electronic device.

21. All that a smart phone or computer user needs to do in order to use an application, website, or email is open up an account with one of the myriad of companies that provide services (e.g. Meta, Microsoft, Google, Discord, Discord, Dropbox, etc.). Once the account is set up, the user can choose the "name" of his/her account, which does not have to match (or even relate to) identifying information of the user. Thus, the user



1 name by itself does nothing to identify the owner of the account, the user, or the  
2 composer of the communication. Nevertheless, often times the communications  
3 themselves, contain information that either directly or indirectly identifies the composer  
4 of the file. Based on my training and experience investigating child exploitation  
5 offenses, I know it is common for collectors of depictions of minors engaged in sexually  
6 explicit conduct to use multiple social media accounts and/or applications in order  
7 conceal their true identity and/or more easily categorize their collection according to the  
8 type of material or source.

9 22. Individuals involved in computer-related crimes often use these accounts to  
10 conduct both criminal and non-criminal communications. Consequently, these  
11 communications can be a great source of information to help identify the sender and/or  
12 recipient of the file and/or message. The ability to view these communications by  
13 investigating law enforcement often provides further investigative leads to assist in  
14 identifying the person of interest.

15 23. I know that an Internet Protocol (IP) address is a numerical label assigned  
16 to devices communicating on the internet and that the Internet Assigned Numbers  
17 Authority (IANA) manages the IP address space allocations globally. An IP address  
18 provides the methodology for communication between devices on the internet. It is a  
19 number that uniquely identifies a device on a computer network and, using transport  
20 protocols, moves information on the internet. Every device directly connected to the  
21 internet must have a unique IP address.

22 24. An IP address is typically comprised of four (4) series of numbers separated  
23 by periods and is most commonly represented as a 32-bit number such as 71.227.252.216  
24 (Internet Protocol Version 4). IPv6 is deployed as well and is represented as a 128-bit  
25 number such as 2001:db8:0:1234:0:567:8:1.

26 25. IP addresses are owned by the Internet Service Provider and leased to a  
27 subscriber/customer for a period of time. They are public and visible to others as you

1 surf the internet. The lessee has no expectation of privacy due to the public nature of IP  
2 addresses.

3 26. When an Internet Service Provider's customer logs onto the internet using a  
4 computer or another web-enabled device, they are assigned an Internet Protocol (IP)  
5 address.

6 27. There are two different types of Internet Protocol addresses. The first is a  
7 dynamic IP address, which means the user's IP address may change each time they log on  
8 to the internet. The frequency in which this address changes is generally controlled by  
9 the Internet Service Provider and not the user. The other type of IP address is a static IP  
10 address, which means that a user is assigned a specific IP address that remains constant  
11 every time they log on to the internet.

12 28. IP addresses are similar to a license plate on a motor vehicle. They are the  
13 property of the issuer, and not the vehicle owner. Just as your license plate is visible as  
14 you cruise your city or town, your IP address is visible as you cruise the internet. Your  
15 IP address is visible to the administrators of websites you visit, attached emails you send,  
16 and broadcast during most internet file and information exchanges that occur on the  
17 internet.

18 29. I know based on my training and experience, that Electronic Service  
19 Providers ("ESP") and/or Internet Service Providers ("ISP," collectively ISP) typically  
20 monitor their services utilized by subscribers. To prevent their communication networks  
21 from serving as conduits for illicit activity and pursuant to the terms of user agreements,  
22 ISPs routinely and systematically attempt to identify suspected depictions of minors  
23 engaged in sexually explicit conduct that may be sent through its facilities. Commonly,  
24 customer complaints alert them that an image or video file being transmitted through  
25 their facilities likely contains suspected depictions of minors engaged in sexually explicit  
26 conduct.

1           30. When an ESP/ISP receives such a complaint or other notice of suspected  
2 depictions of minors engaged in sexually explicit conduct, they may employ a “graphic  
3 review analyst” or an equivalent employee to open and look at the image or video file to  
4 form an opinion as to whether what is depicted likely meets the federal criminal  
5 definition of depictions of minors engaged in sexually explicit conduct found in 18 USC  
6 § 2256, which is defined as any visual depiction, including any photograph, film, video,  
7 picture, or computer or computer-generated image or picture, whether made or produced  
8 by electronic, mechanical, or other means, of sexually explicit conduct, where: (A) the  
9 production of such visual depiction involves the use of a minor engaging in sexually  
10 explicit conduct; (B) such visual depiction is a digital image, computer image, or  
11 computer-generated image that is, or is indistinguishable from, that of a minor engaging  
12 in sexually explicit conduct; or (C) such visual depiction has been created, adapted, or  
13 modified to appear that an identifiable minor is engaging in sexually explicit conduct. If  
14 the employee concludes that the file contains what appears to be depictions of minors  
15 engaged in sexually explicit conduct, a hash value of the file can be generated by  
16 operation of a mathematical algorithm. A hash value is an alphanumeric sequence that is  
17 unique to a specific digital file. Any identical copy of the file will have exactly the same  
18 hash value as the original, but any alteration of the file, including even a change of one or  
19 two pixels, results in a different hash value. Consequently, an unknown image can be  
20 determined to be identical to an original file if it has the same hash value as the original.  
21 The hash value is, in essence, the unique fingerprint of that file, and when a match of the  
22 “fingerprint” occurs, the file also matches. Several different algorithms are commonly  
23 used to hash-identify files, including Message Digest 5 (MD5) and Secure Hash  
24 Algorithm 1 (SHA-1).

25           31. Hash values are a very reliable method of authenticating files. It can be  
26 concluded with an extremely high degree of certainty that two files sharing the same hash  
27 value also share identical content. Based on my training and experience, as well as others

1 in this field, I know it is more likely that two humans would share the same biological  
2 DNA than for two files to share the same hash value. If even one bit (the smallest  
3 measure of data in a file) of a file is changed, the entire hash value of that file changes  
4 completely. As an example that demonstrates the uniqueness of a SHA-1 hash, the  
5 likelihood of two files having the same SHA-1 hash value is  $2^{128}$  or:1 in  
6 340,000,000,000,000,000,000,000,000,000,000,000 chance. In an August 6<sup>th</sup>, 2020  
7 article in Live Science<sup>1</sup>, according to Professor Simona Francese, PhD, a forensic  
8 scientist and fingerprint expert from Sheffield Hallam University in the United Kingdom,  
9 the likelihood of two humans having the same fingerprint is estimated to be:1 in  
10 64,000,000,000.<sup>2</sup>

11 32. For two different files to have the same hash value is called a *collision*. I  
12 know from experience that there have been no documented incidents of a collision  
13 involving SHA-1 hash values “in the wild” since its creation in 1995. I am, however,  
14 aware of a reported collision involving two files sharing the same SHA-1 value in a lab  
15 setting. This was done purposely by engineers at Google<sup>3</sup> in 2017 under controlled  
16 conditions for the sole purpose of creating this collision. Even with this knowledge in  
17 mind, I am confident that the possibility of a suspected child sexual abuse material file  
18 reported in a CyberTip having the same hash value as an unrelated, non-criminal file is  
19 extremely unlikely. I believe hash value comparison is a highly reliable method of  
20 determining if two files are the same or different, and that a confirmed hash match  
21 between two files is a forensic finding on a par with a DNA match or a fingerprint match.

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24 <sup>1</sup> Baker, Harry. “Do Identical Twins Have Identical Fingerprints?” LiveScience, Purch, 7 Aug. 2021,  
25 <https://www.livescience.com/do-identical-twins-have-identical-fingerprints.html>.

26 <sup>2</sup> Of note, in the same article, Professor Francese, who is a peer-reviewed, published scientist, commented, “to this  
day, no two fingerprints have been found to be identical.”

27 <sup>3</sup> “Announcing the First sha1 Collision.” *Google Online Security Blog*, 23 Feb. 2017,  
<https://security.googleblog.com/2017/02/announcing-first-sha1-collision.html>.

1           33.     ESPs typically maintain a database of hash values of files that they have  
2 determined to meet the federal definition of depictions of minors engaged in sexually  
3 explicit conduct found in 18 USC § 2256. The ISPs typically do not maintain the actual  
4 suspect files themselves; once a file is determined to contain suspected depictions of  
5 minors engaged in sexually explicit conduct, the file is deleted from their system.

6           34.     The ESPs can then use Image Detection and Filtering Process (“IDFP”),  
7 Photo DNA (pDNA), or a similar technology which compares the hash values of files  
8 embedded in or attached to transmitted files against their database containing what is  
9 essentially a catalog of hash values of files that have previously been identified as  
10 containing suspected depictions of minors engaged in sexually explicit conduct.

11           35.     When the ESP detects a file passing through its network that has the same  
12 hash value as an image or video file of suspected depictions of minors engaged in  
13 sexually explicit conduct contained in the database through a variety of methods, the ISP  
14 reports that fact to National Center for Missing and Exploited Children (NCMEC) via the  
15 latter’s CyberTipline. By statute, an ESP or ISP has a duty to report to NCMEC any  
16 apparent depictions of minors engaged in sexually explicit conduct it discovers “as soon  
17 as reasonably possible.” 18 U.S.C. § 2258A(a)(1). The CyberTip line report transmits  
18 the intercepted file to NCMEC. Often that occurs without an ISP employee opening or  
19 viewing the file because the files hash value, or “fingerprint,” has already been associated  
20 to a file of suspected depictions of minors engaged in sexually explicit conduct. The  
21 ISP’s decision to report a file to NCMEC is made solely on the basis of the match of the  
22 unique hash value of the suspected depictions of minors engaged in sexually explicit  
23 conduct to the identical hash value in the suspect transmission.

24           36.     ESP’s also monitor which devices are used to access their platform by  
25 recording the advertising identification number. This number is a unique identifier  
26 assigned to hardware devices used by ESP’s to track users semi-anonymously and  
27 provide targeted advertisements. Because it is a unique identifier, this information can

1 link specific devices owned by specific individuals with the criminal activity on a  
2 particular platform's account.

3 37. Most Internet Service Providers keep subscriber records relating to the IP  
4 address they assign, and that information is available to investigators. Typically, an  
5 investigator has to submit legal process (e.g. subpoena or search warrant) requesting the  
6 subscriber information relating to a particular IP address at a specific date and time.

7 38. A variety of publicly available websites provide a public query/response  
8 protocol that is widely used for querying databases in order to determine the registrant or  
9 assignee of internet resources, such as a domain name or an IP address block. These  
10 include WHOIS, MaxMind, arin.net, and other common search tools.

11 39. The act of "downloading" is commonly described in computer networks as  
12 a means to receive data to a local system from a remote system, or to initiate such a data  
13 transfer. Examples of a remote system from which a download might be performed  
14 include a webserver, FTP server, email server, or other similar systems. A download can  
15 mean either any file that is offered for downloading or that has been downloaded, or the  
16 process of receiving such a file. The inverse operation, "uploading," refers to the sending  
17 of data from a local system to a remote system such as a server or another client with the  
18 intent that the remote system should store a copy of the data being transferred, or the  
19 initiation of such a process.

20 40. The National Center for Missing and Exploited Children (NCMEC) is a  
21 private, non-profit organization established in 1984 by the United States Congress.  
22 Primarily funded by the Justice Department, the NCMEC acts as an information  
23 clearinghouse and resource for parents, children, law enforcement agencies, schools, and  
24 communities to assist in locating missing children and to raise public awareness about  
25 ways to prevent child abduction, child sexual abuse and depictions of minors engaged in  
26 sexually explicit conduct.

1           41. The Center provides information to help locate children reported missing  
2 (by parental abduction, child abduction, or running away from home) and to assist  
3 physically and sexually abused children. In this resource capacity, the NCMEC  
4 distributes photographs of missing children and accepts tips and information from the  
5 public. It also coordinates these activities with numerous state and federal law  
6 enforcement agencies.

7           42. The CyberTipline offers a means of reporting incidents of child sexual  
8 exploitation including the possession, manufacture, and/or distribution of depictions of  
9 minors engaged in sexually explicit conduct; online enticement; child prostitution; child  
10 sex tourism; extra familial child sexual molestation; unsolicited obscene material sent to a  
11 child; and misleading domain names, words, or digital images.

12           43. Any incidents reported to the CyberTipline online or by telephone go  
13 through this three-step process: CyberTipline operators review and prioritize each lead;  
14 NCMEC's Exploited Children Division analyzes tips and conducts additional research;  
15 The information is accessible to the FBI, ICE, and the USFIS via a secure Web  
16 connection. Information is also forwarded to the ICACs and pertinent international, state,  
17 and local authorities and, when appropriate, to the ESP.

18           44. Based upon my knowledge, experience, and training in depictions of  
19 minors engaged in sexually explicit conduct investigations, and the training and  
20 experience of other law enforcement officers with whom I have had discussions, I know  
21 that there are certain characteristics common to individuals involved in depictions of  
22 minors engaged in sexually explicit conduct:

23           a. Those who possess, receive, and attempt to receive depictions of  
24 minors engaged in sexually explicit conduct may receive sexual gratification, stimulation,  
25 and satisfaction from contact with children; or from fantasies they may have viewing  
26 children engaged in sexual activity or in sexually suggestive poses, such as in person, in  
27 photographs, or other visual media; or from literature describing such activity.



1           b.       Those who possess, receive, and attempt to receive depictions of  
2 minors engaged in sexually explicit conduct may collect sexually explicit or suggestive  
3 materials in a variety of media, including photographs, magazines, motion pictures,  
4 videotapes, books, slides, and/or drawings or other visual media. Such individuals often  
5 times use these materials for their own sexual arousal and gratification. Further, they  
6 may use these materials to lower the inhibitions of children they are attempting to seduce,  
7 to arouse the selected child partner, or to demonstrate the desired sexual acts. These  
8 individuals may keep records, to include names, contact information, and/or dates of  
9 these interactions, of the children they have attempted to seduce, arouse, or with whom  
10 they have engaged in the desired sexual acts.

11           c.       Those who possess, receive, and attempt to receive depictions of  
12 minors engaged in sexually explicit conduct often possess and maintain their “hard  
13 copies” of child pornographic material, that is, their pictures, films, video tapes,  
14 magazines, negatives, photographs, correspondence, mailing lists, books, tape recordings,  
15 etc., in the privacy and security of their home or some other secure location. These  
16 individuals typically retain these “hard copies” of child pornographic material for many  
17 years.

18           d.       Likewise, those who possess, receive, and attempt to receive  
19 depictions of minors engaged in sexually explicit conduct often maintain their collections  
20 that are in a digital or electronic format in a safe, secure and private environment, such as  
21 a computer and surrounding area. These collections are often maintained for several  
22 years and are kept close by, usually at the individual’s residence, to enable the collector  
23 to view the collection, which is valued highly.

24           e.       Those who possess, receive, and attempt to receive depictions of  
25 minors engaged in sexually explicit conduct also may correspond with and/or meet others  
26 to share information and materials; rarely destroy correspondence from other depictions  
27 of minors engaged in sexually explicit conduct distributors/collectors; conceal such  
correspondence as they do their sexually explicit material; and often maintain lists of  
names, addresses, and telephone numbers of individuals with whom they have been in  
contact and who share the same interests in depictions of minors engaged in sexually  
explicit conduct.

28           f.       Those that possess, receive and attempt to receive depictions of  
29 minors engaged in sexually explicit conduct prefer not to be without their depictions of  
30 minors engaged in sexually explicit conduct for any prolonged time period. This  
31 behavior has been documented by law enforcement officers involved in the investigation  
32 of depictions of minors engaged in sexually explicit conduct throughout the world.

1           45. Based on my training and experience, collectors and distributors of  
2 depictions of minors engaged in sexually explicit conduct also use online, remote,  
3 resources to retrieve and store depictions of minors engaged in sexually explicit conduct,  
4 including services offered by many companies for cloud-storage and digital  
5 communications. The online services allow a user to set up an account with a remote  
6 computing service that provides email services and/or electronic storage of electronic  
7 files in any variety of formats. A user can set up, and access, an online storage account  
8 from any computer or digital device with access to the internet. Evidence of such online  
9 storage of depictions of minors engaged in sexually explicit conduct is often found on the  
10 user's computer or smart phone. Even in cases where online storage is used, however,  
11 evidence of depictions of minors engaged in sexually explicit conduct can be found on a  
12 user's digital device if that device is used to access the internet. Cloud storage allows the  
13 offender ready access to the material from any device that has an internet connection,  
14 worldwide, while also attempting to obfuscate or limit the criminality of possession as the  
15 material is stored remotely and not on the offender's device. Evidence located in cloud  
16 storage may be deleted from any device capable of reaching the website of the cloud  
17 hosting company. Once the individual user credentials, often a username and password  
18 are entered, the data in the cloud storage may be accessed, modified, shared, or deleted.  
19 Unlike deleting data from a local hard drive, once data is deleted from cloud storage, it is  
20 wiped from the cloud hosting company's servers and is unrecoverable.

21           46. In addition to the traditional collector, law enforcement has encountered  
22 offenders who obtain depictions of minors engaged in sexually explicit conduct from the  
23 internet, view the contents and subsequently delete the contraband, often after engaging  
24 in self-gratification. In light of technological advancements, increasing internet speeds  
25 and worldwide availability of child sexual exploitative material, this phenomenon offers  
26 the offender a sense of decreasing risk of being identified and/or apprehended with  
27 quantities of contraband. This type of consumer is commonly referred to as a 'seek and

1 delete' offender, knowing that the same or different contraband satisfying their interests  
2 remain easily discoverable and accessible online for future viewing and self-gratification.

3 47. Additionally, offenders may opt to store the contraband in cloud accounts.  
4 Cloud storage is a model of data storage where the digital data is stored in logical pools,  
5 the physical storage can span multiple servers, and often locations, and the physical  
6 environment is typically owned and managed by a hosting company. Cloud storage  
7 allows the offender ready access to the material from any device that has an internet  
8 connection, worldwide, while also attempting to obfuscate or limit the criminality of  
9 possession as the material is stored remotely and not on the offender's device.

10 48. Based on my training and experience and my consultation with computer  
11 forensic detectives and agents who are familiar with searches of computers and  
12 smartphones, I have learned that offenders will try and obfuscate data containing images  
13 and videos of minors engaged in sexual activity. One potential manner of trying to hide  
14 the contraband may be by changing file extensions. For example, an image file may often  
15 have a file extension of ".jpg" or ".jpeg" signifying that it is an image or photograph. An  
16 offender may change the file extension by selecting the "save as" format on a computer  
17 or digital device and select ".doc" or ".docx" to make it appear that instead of a  
18 contraband image or photograph, it is a word document. The same process may be used  
19 to attempt to hide a video file as well. Based on these, and other attempts to hide potential  
20 contraband is necessary for forensic examiners to examine all potential data on a digital  
21 device.

22 49. I know that, regardless of whether a person discards or collects depictions  
23 of minors engaged in sexually explicit conduct he accesses for purposes of viewing and  
24 sexual gratification, evidence of such activity is likely to be found on computers and  
25 related devices, including storage media, used by the person. This evidence may include  
26 the files themselves, logs of account access events, contact lists of others engaged in  
27

1 trafficking of depictions of minors engaged in sexually explicit conduct, backup files, and  
2 other electronic artifacts that may be forensically recoverable.

3 **BACKGROUND CONCERNING DISCORD INC. (Discord)**<sup>4</sup>

4 50. Discord is a messaging platform where millions of users from around the  
5 world connect with each other through chat, voice, and video. We have both a desktop  
6 (PC, Mac, Linux) application and a mobile (iOS, Android) application, and the service  
7 can also be accessed from the website directly at [www.discordapp.com](http://www.discordapp.com) .

8 51. In order to use the services, users need to create an account by selecting a  
9 username. Once they've made their account, users can create a server and invite their  
10 friends to join it with an invite link, or they can join an existing server. Servers are  
11 broken down into sub-categories or "channels" where users can connect with each other  
12 by either chatting or calling. Users can also communicate through direct messages, which  
13 are private chats created between 1-10 users.

14 52. Service Provider Records: Subscriber information (often known as  
15 "registration information" for Internet applications or service) is obtained by the service  
16 provider when an account is established and typically includes information such as: The  
17 subscriber name, address, billing/payment information; account initiation date; changes  
18 to the account; type of account; custom account features; additional phone numbers,  
19 email addresses, and/or other contact information; additional persons having authority on  
20 the account; any additional accounts linked to the subject account; and unique identifiers  
21 for the device using the target address, and other devices the customer of the subject  
22 account uses. In my experience, this information frequently provides investigative leads.

23 53. The following is an excerpt from Discord's Law Enforcement Guide  
24 website discussing the types of information they collect:

---

25  
26 <sup>4</sup> The information in this section is based on information published by Discord's "Privacy Policy" website, including,  
27 but not limited to, the following webpages: "Privacy Policy available at <https://values.snap.com/privacy/privacy-policy>, as well as the Discord Law Enforcement Guide.

Content Available Pursuant to a Search Warrant to Discord

*Discord stores messages and attachments that users send to each other in text channels, whether it's in a server or in direct messages. These messages and attachments are obtainable through a search warrant. However, Discord does not store the content of voice and video calls. Additionally, if users delete content, that content is immediately deleted and is not retained. Additional non-content information is also available. The following non-content information is available pursuant to a valid subpoena:*

- 1. The unique User ID number of the account that is assigned by Discord*
- 2. Registration date and time for the account*
- 3. Registration IP address of the account*
- 4. Email address provided by the user*
- 5. User's current username and tag number*
- 6. If the user is a paid subscriber, limited billing information*
- 7. IP addresses and session start-timestamps for the last 90 days.*

**SUMMARY OF PROBABLE CAUSE**

**CR23-191 RSM *United States v. Bennett S. Park* – Production of Child Pornography**

54. In July 2023, Homeland Security Investigations (HSI) conducted an undercover chat investigation that targeted people with a sexual interest in children by posting advertisements on various online social media platforms. On or about July 7, 2023, someone with the profile name "icon0clash" responded to an ad which an undercover agent (UCA) had posted reading: "*Single mom with 2lils bored @ home.*" Agents later identified this person as Bennett Sung PARK (DOB 05-15-1981).

55. In chats with the UCA, PARK said he was sexually attracted to young girls and was interested in meeting with the UCA's 7 and 10-year-old daughters. PARK also claimed he had previously been sexually active with children ranging in ages from 11 to

1 17 years old. PARK described what he wanted to do with the UC's children and said, "I  
2 *want to dress her up in a cute outfit, touch her legs, her body, and maybe finger her,*"  
3 *"Rub my cock on her little cunt, not penetrate,"* and *"Teach her how to make me cum."*  
4 PARK also told the UCA that he had recently initiated a sexual relationship with a 17-  
5 year-old and had filmed their sexual activity.

6 56. On or about August 7, 2023, while the UCA and PARK were discussing a  
7 possible date to meet, PARK said he may meet up with a 13-year-old who has since been  
8 identified as MV1. PARK said he met MV1 on Discord where MV1 sent him photos and  
9 gave him her home address. When the UCA asked what PARK wanted to do with MV1,  
10 he said, *"Touch her little body, finger her, make her suck my cock, bend her over, rub my*  
11 *cock on her, maybe put it in her,"* PARK also said he was *"going to take pics and vids*  
12 *too."* PARK told the UCA he planned to pick up MV1 at midnight on August 8, 2023,  
13 when MV1 would be able to sneak out of her house. HSI immediately surveilled PARK's  
14 Snohomish County residence, followed him to a location in Everett at 1:45 a.m.,  
15 observed a 13-year-old female enter his car, intervened, and placed PARK under arrest.  
16 Sexual Assault charges against Park are pending in Snohomish County.

17 57. An emergency request for records associated to PARK's known emails and  
18 identifiers was sent to Discord on or about August 7, 2023. Discord provided a username  
19 associated to PARK as spacecowboy9261#0000. The email address associated with the  
20 account is listed as lylaflower49@gmail.com and the User ID number is  
21 893028927956738089. The Discord account associated to username spacecowboy9261#0  
22 will herein be referred to as SUBJECT ACCOUNT 1. On or about August 9, 2023, HSI  
23 Seattle served a search warrant for Discord records relating to the communication  
24 between MV1 and PARK.

25 58. Between approximately August 10, 2023, and August 25, 2023, HSI Seattle  
26 received CyberTips from Discord via the National Center for Missing and Exploited  
27 Children (NCMEC) under 10 CyberTips 170205334, 170204161, 170721846,



170717225, 170735257, 170869992, 170207128, 171040890, 171040138, and 52961381. The CyberTips identified two Discord accounts that appeared to engage in grooming behavior with minor children, some of which appear to have also been used to meet up with minor children for sexual purposes, as well as solicited child sexual abuse material (CSAM) from, and shared CSAM. The reported accounts are listed below as follows and will be referred to as SUBJECT ACCOUNT 1 and SUBJECT ACCOUNT 2:

**SUBJECT ACCOUNT 1**

Phone: 510-717-9227

Email Address: lylaflower49@gmail.com

Username: spacecowboy9261#0000

User ID: 893028927956738089

Related CyberTips: 170205334, 170204161, 170721846, 170717225, 170735257, 170869992, 170207128

**SUBJECT ACCOUNT 2**

Phone: 510-717-9227

Email Address: bennettspark@gmail.com

Username: MoonMan#4642

User ID: 432783654557843456

Related CyberTips: 171040890, 171040138, 52961381

59. SUBJECT ACCOUNT 1 communicated with several accounts that appear to belong to minor children. The accounts of this set of suspected minor children are herein referred to as MV1 through MV11, and MV14.

60. SUBJECT ACCOUNT 2 also communicated with multiple accounts that appear to belong to minor children, referred to as MV15 through MV23 which are described below in detail.

61. In August 2023, HSI Seattle executed a residential search warrant at PARK's home and several electronic devices were seized, pending further forensic



1 examination. As a result, HSI agents located chats reported by Instagram between PARK  
 2 and a 12-year-old female (MV12 – currently charged in CR23-191 RSM) in which  
 3 PARK acknowledged her age, repeatedly asked for sexually imagery of the child,  
 4 repeatedly and graphically discussed the sexual activity he wished to engage in with the  
 5 minor, and his receipt of numerous files of the child engaging in acts of self-exploitation.  
 6 As a result, PARK was indicted on one count of Production of Child Pornography in  
 7 violation of Title 18, United States Code, Sections 2251(a), 2251(e) in the Western  
 8 District of Washington on December 13, 2023, and is pending trial.

9  
 10 62. In October and November 2023, electronic search warrants were also sent  
 11 to Instagram and Google relating to PARK's accounts and possible sexual contact with  
 12 minor children using those platforms.

13 **Park's Discord Communications using SUBJECT ACCOUNT 1 with MV 1-11 and**  
 14 **MV 14**

15 63. Based on CyberTips 170721846, 170735257, 170869992, 170205334,  
 16 170204161, 170717225, and 170207128, SUBJECT ACCOUNT 1 messaged several  
 17 accounts that appear to belong to minor children. In my review of Minor victim (MV)  
 18 accounts 4 through 11 and MV14, I observed that all of the MV's provided their age  
 19 directly in their messages with PARK, stating they were between 13-17 years old. While  
 20 some other conversations between MV accounts and PARK do not explicitly state the  
 21 MV's age, other context in the chats makes it clear that PARK was aware of the  
 22 children's ages as described in detail below.

23 **PARK'S COMMUNICATION WITH MV1 ACCOUNT - CR23-191 RSM**

24 **Charged Count 2: Enticement of a Minor**

25 64. In CyberTip 170205334, Discord reported the chat conversation between  
 26 PARK, using SUBJECT ACCOUNT 1, and MV1 from August 2023. PARK appeared to  
 27 already be aware of MV1's age despite it not being mentioned in the chat messages. For

1 example, PARK admitted in chats with the HSI undercover agent (UCA) in August 2023  
 2 that MV1 was 13 years old. A review of the chats between PARK and MV1, PARK  
 3 asked MV1 sexual questions such as, *“Are you a virgin??”* MV1 replied, *“What is that,”*  
 4 and PARK explained, *“It means have you had sex before”* to which MV1 said, *“I not do*  
 5 *that.”* PARK continued to ask MV1, *“Have you ever given a blowjob, princess”* to  
 6 which MV1 replied, *“Stoppp u being naughty.”* PARK also stated that he wanted MV1 to  
 7 model for him when they met up in person elaborating, *“I want you to wear the outfit in*  
 8 *your last video, and I want you to bring your white thigh highs, your pink skirt, and your*  
 9 *white fishnet thigh highs,”* adding, *“And wear your cutest panties :).”* PARK went  
 10 further to ask MV1 which underwear were her favorite and instructed MV1 which  
 11 underwear to wear and bring for their meet-up.

12 65. PARK was explicit in his chat with the UCA on the same date when he  
 13 described what he intended to do with MV1. PARK told the UCA he planned to *“Touch*  
 14 *her little body, finger her, make her suck my cock, bend her over, rub my cock on her,*  
 15 *maybe put it in her,”* PARK also said he was *“going to take pics and vids too.”* Some of  
 16 the account information for MV1 provided by Discord in CyberTip 170205334 is as  
 17 follows:

18 **MV1**

19 Account ID: 1052882529054642216

20 Username: baezy\_#0000

21 Time period: August 6, 2023, through August 8, 2023, UTC

22 **PARK’S COMMUNICATION WITH MV2 ACCOUNT**

23 66. In CyberTip 170735257, Discord reported a chat between PARK, using  
 24 SUBJECT ACCOUNT 1, and MV2 that spanned from August 24, 2022, to August 29,  
 25 2022. While MV2 did not share her age directly in her messages with PARK, PARK  
 26 seemed aware she was a child by telling MV2, *“btw... I’m a lot older than you. You know*  
 27 *that, right princess?”* and adding *“I don’t want to lie though I’m basically 40.”* PARK

1 added he was concerned about being seen in public with MV2 saying, *"I don't want your*  
 2 *work seeing you meeting and older man"* and *"Are your parents home? I don't want*  
 3 *anyone seeing me picking you up lol."* In a separate message thread provided in the  
 4 CyberTip 170735257, MV2 told another user that she used to work at a boba shop for a  
 5 year and that it was stressful. MV2 then added, *"especially cause i was like managing the*  
 6 *place at age 16."* This thread documented MV2's age at the time when MV2 was in  
 7 contact with PARK.

8 67. Throughout the chat PARK repeatedly made comments about touching  
 9 MV2's legs, saying things like, *"If you wear that skirt.. it's going to be hard not to want*  
 10 *to touch your legs, cuz they look so soft n smooth, ngl."* PARK also instructed MV2 what  
 11 clothes to wear and instructed MV2 to wear her *"cutest panties."* PARK mentioned to  
 12 MV2 that he would like to hang out with her at his house rather than just at the boba tea  
 13 shop they initially planned to meet at adding, *"And plus, I can't touch your thighs at your*  
 14 *work, princess lol."* Some of the account information for MV2 provided by Discord in  
 15 CyberTip 170735257 is as follows:

16 **MV2**

17 Account ID: 711460293473075221

18 Username: mayoxhen#0000

19 Time period: August 24, 2022, through August 29, 2022, UTC

20 **PARK'S COMMUNICATION WITH MV3**

21 68. In CyberTip 170869992, Discord reported several chats between PARK,  
 22 using SUBJECT ACCOUNT 1, and minor children, including the chat messages between  
 23 PARK and MV3 from July 2022. PARK acknowledged MV3 was a minor by saying  
 24 things like, *"I actually do photo shoots for young models like you"* and when MV3 stated  
 25 that her parents would not allow her to model, PARK again acknowledged MV3's young  
 26 age by saying, *"Aw well I understand, you're still very young."* PARK then went on to  
 27 repeatedly tell MV3 that he had done photo shoots for young girls and that he would like

1 to do a photo shoot with MV3, saying, *“I’ve actually done secret photo shoots for girls*  
 2 *with parents like yours,”* and, *“You would be great in a photo shoot, I would love to have*  
 3 *you as a model.”* MV3 repeatedly told PARK that she was not interested in modeling for  
 4 him. Despite this rebuke, PARK asked to see more pictures of MV3 and MV3 again  
 5 declined and asked PARK if she should block him. While PARK failed in engaging in  
 6 further sexual conversation with MV3, the repeated requests for MV3 to model and for  
 7 photos of MV3 demonstrates a pattern of PARK’s sexualized interest in minors and  
 8 grooming behaviors. Some of the account information for MV3 provided by Discord in  
 9 CyberTip 170869992 is as follows:

10 **MV3**

11 Account ID: 895181087511298068

12 Username: luna9967#0000

13 Time period: July 23, 2022, through July 23, 2022, UTC

14 **PARK’S COMMUNICATION WITH MV4**

15 69. In CyberTip 170869992, Discord reported several chats between PARK,  
 16 using SUBJECT ACCOUNT 1, and minor children, including chat messages between  
 17 PARK and MV4 from July and August 2022. In the first few lines of the chat PARK  
 18 asked for MV4’s age and MV4 responded that she was 15 years old. After knowing  
 19 MV4’s age, PARK asked MV4 for photos of herself and made comments about her body  
 20 to include: *“You look like you have a pretty body too:)”* and *“I would love to see more of*  
 21 *your body.”* After receiving more clothed photos of MV4, PARK asked, *“Hmm do you*  
 22 *ever take pics in just your panties, princess??”* MV4 then provided two photos of a  
 23 pubescent female in a bra and underwear pictured from the chest to the mid-thigh. Some  
 24 of the account information for MV4 provided by Discord in CyberTip 170869992 is as  
 25 follows:

26 **MV4**

27 Account ID: 826123343622176809

1 Username: prettygirl2#0000

2 Time period: July 23, 2022, through August 3, 2022, UTC

3 **PARK'S COMMUNICATION WITH MV5**

4 70. In CyberTip 170869992, Discord reported several chats between PARK,  
5 using SUBJECT ACCOUNT 1, and suspected minor children, including chat messages  
6 between PARK and MV5 from July 2022. The following are excerpts of the chats  
7 reported in CyberTip 170869992 of the messages between PARK (SUBJECT  
8 ACCOUNT 1) and MV5, starting on July 24, 2022, at approximately 12:02:34 UTC.

9 SUBJECT ACCOUNT 1: What is your age, little one

10 MV5: 16

11 SUBJECT ACCOUNT 1: Very good:) where are you from? Id you don't mind  
12 saying

13 MV5: I'm from Arizona

14 SUBJECT ACCOUNT 1: I'm not too far away from you, in Washington

15 SUBJECT ACCOUNT 1: I've gone to Arizona for work and other reasons  
16 before...

17 MV5: Oh okay

18 SUBJECT ACCOUNT 1: May I see a pic of you

19 MV5: Not of my face but I'll show my body

20 MV5: [MV5 sends an image file titled "Snapchat-631022492.jpg" which appears  
21 to show the right half of a pubescent female's bare chest and torso. The female's  
22 breast is exposed and the female's hand appears to be pinching the exposed nipple.  
23 Because the image is close up it is difficult to discern an estimated age of the  
24 female. The image file was provided by Discord in CyberTip 170207128.]

25 SUBJECT ACCOUNT 1: I need to see more

26 MV5: ok

1 MV5: [MV5 sends a video file titled “Snapchat-1510522374.mp4” which appears  
2 to show a pubescent female rubbing her exposed vagina with one hand. The focus  
3 of the video is on the female’s exposed vagina. The female appears to be sitting on  
4 a spotted black and white colored blanket. While it is difficult to estimate the  
5 female’s age as no other body features of the female are visible, due to the  
6 female’s pubic hair development it is believed that the female is pubescent. The  
7 video is 5 seconds in duration. The video file was provided by Discord in  
8 CyberTip 170207128.]

9 SUBJECT ACCOUNT 1: Good girl :))

10 MV5: Hehe

11 MV5: Are u a daddy or a buyer

12 SUBJECT ACCOUNT 1: [PARK sends an image file titled “IMG\_6154.jpg” that  
13 shows a male reclined on a bed wearing a black and blue colored sleeveless shirt.  
14 The male appears to have short black hair. The male’s erect penis is exposed and  
15 the camera is angled in such a way that the male’s penis blocks the male’s face  
16 from being visible in the image.]

17 SUBJECT ACCOUNT 1: Daddy. I don’t buy.

18 MV5: Oh ok

19 SUBJECT ACCOUNT 1: I have lots of experience molesting little girls like you...  
20 I never buy

21 MV5: Hehe I’m rather new at this lol

22 SUBJECT ACCOUNT 1: I like that:)

23 MV5: I’m still very innocent

24 SUBJECT ACCOUNT 1: I can teach you. Mentor you.

25 MV5: I hope u can help me with that

26 SUBJECT ACCOUNT 1: Yes. I can see that:)

27 SUBJECT ACCOUNT 1: Yes, I can princess

1 SUBJECT ACCOUNT 1: You just have to be a good girl, and listen to me

2 MV5: I mostly do this so I can get “stuff” to pleasure myself with ifyky

3 SUBJECT ACCOUNT 1: You naughty little girl

4 MV5: I want a dildo if u don’t understand what I’m saying

5 SUBJECT ACCOUNT 1: I recently bought a girl your age a dildo

6 SUBJECT ACCOUNT 1: She lives near me

7 [Timestamp 07/24/2022 8:10AM]

8 [...]

9 [Timestamp 07/24/2022 8:12AM]

10 MV5: Heh u care more about me than my other daddy

11 SUBJECT ACCOUNT 1: Now why don’t you be a good girl, and show me more  
12 of you

13 MV5: He was a ass

14 MV5: Ok

15 DISCORD 1: Forget him. To me you are a cute little princess

16 SUBJECT ACCOUNT 1: Who needs to be taken care of, very very well :))

17 MV5: [MV5 sends the same video file “Snapchat-1510522374.mp4” that was  
18 previously described.]

19 MV5: Hehe

20 MV5: it’s my virgin pussy

21 SUBJECT ACCOUNT 1: You already sent that one, princess

22 MV5: Oh

23 MV5: Wrong vid then

24 MV5: [MV5 sends a video file titled “Snapchat-1023152846.mp4” which appears  
25 to show a pubescent female rubbing her exposed vagina with one hand. The focus  
26 of the video is on the female’s exposed vagina. The female appears to be sitting on  
27 the same black and white spotted blanket as was seen in the previous video file



1 sent by MV5. While it is difficult to estimate the female's age as no other body  
 2 features of the female are visible, due to the female's pubic hair development it is  
 3 believed that the female is pubescent. The video is 9 seconds in duration. The  
 4 video file was provided by Discord in CyberTip 170207128.]

5 SUBJECT ACCOUNT 1: But I love it

6 MV5: ty :)

7 SUBJECT ACCOUNT 1: Look at your cute little hands, princess :)

8 SUBJECT ACCOUNT 1: You look so smol... n tight... . Hmmm...

9 [Timestamp 07/24/2022 08:15AM]

10 71. Some of the account information for MV5 provided by Discord in  
 11 CyberTip 170869992 is as follows:

12 **MV5**

13 Account ID: 678711470497726485

14 Username: volietnce#0000

15 Time period: July 24, 2022, through July 28, 2022, UTC

16 **PARK'S COMMUNICATION WITH MV6 ACCOUNT**

17 72. In CyberTip 170869992, Discord reported several chats between PARK,  
 18 using SUBJECT ACCOUNT 1, and suspected minor children, including the chat  
 19 messages between PARK and MV6 from July 2022. In the chat, PARK asked MV6's age  
 20 within the first few messages, to which MV6 responded that she was 15 years old. After  
 21 knowing MV6's age, PARK told MV6, *"You seem like a really cute n sweet little girl:)"*  
 22 to which MV6 replied, *"hey now, im not little."* PARK went on in later lines to say,  
 23 *"Actually you seem so little and sweet, that I have a hard on ;p And I could show you*  
 24 *too:)"* Based on the chat messages between PARK and MV6, PARK appeared to have  
 25 been talking to MV6's partner as well in a separate chat, as both of them refer to another  
 26 person named "Xylo." At one point, PARK mentioned, *"I really wish. I could see pics of*  
 27 *you and xylo :))"* to which MV6 responded, *"i think its best if you leave xylo out of this,*

1 *theyre young and dont really know what theyre doing.*” Some of the account information  
 2 for MV6 provided by Discord in CyberTip 170869992 is as follows:

3 **MV6**

4 Account ID: 906379051550248971

5 Username: jo876543#0000

6 Time period: July 31, 2022, through July 31, 2022, UTC

7 **PARK’S COMMUNICATION WITH MV7 ACCOUNT**

8 73. In CyberTip 170869992, Discord reported several chats between PARK,  
 9 using SUBJECT ACCOUNT 1, and suspected minor children, including the chat  
 10 messages between PARK and MV7 from August 2022. Almost immediately PARK  
 11 asked MV7 her age, to which MV7 responded that she was 13 years old. PARK later  
 12 asked MV7 for a photo of herself. MV7 declined to send a photo, saying she was  
 13 nervous, to which PARK said, *“Aww it’s ok, I understand :) I bet you I’ll really like your*  
 14 *pics though :))”* and added, *“You already seem like such a cute sweet girl :) So I would*  
 15 *love to see you no matter what.”* PARK informed MV7 that should take photos of herself  
 16 wearing thigh-high socks adding, *“It would make me very very happy :)”* MV7 replied,  
 17 *“maybe I can send a few pics for free haha”* and later followed up by asking, *“would u*  
 18 *ever be ok w paying me maybe??”* to which PARK responded, *“Tbh, I’m not a buy, I’ve*  
 19 *never actually bought before. But I’ve been friends with, and met other girls your age*  
 20 *before online and irl, And sometimes I’ve met girls irl and I took pics and videos of them*  
 21 *myself, So I have a lot of content I’ve made on my own that’s why I don’t buy.”* The  
 22 following day, PARK asked MV7 if she would be willing to do a meet-up. MV7  
 23 responded, *“probably not,”* and PARK added, *“I’m in Washington right above you. It*  
 24 *would be easy. And I would pay you.”* MV7 responded, *“pay me how much??”* to which  
 25 PARK replied, *“You name a price.”* Some of the account information for MV7 provided  
 26 by Discord in CyberTip 170869992 is as follows:

27 **MV7**

1 Account ID: 1003928511490302002

2 Username: Deleted User d2c0a72c#7499

3 Time period: August 2, 2022, through August 6, 2022, UTC

4 **PARK'S COMMUNICATION WITH MV8 ACCOUNT**

5 74. In CyberTip 170869992, Discord reported several chats between PARK,  
6 using SUBJECT ACCOUNT 1, and suspected minor children, including the chat  
7 messages between PARK and MV8 spanning from August 2022 to April 2023. PARK  
8 asked MV8 her age and MV8 responded that she was 15 years old. Later in the chat,  
9 MV8 asked PARK, *"i forgot to ask is it ok that i'm 15?"* to which PARK responded, *"of*  
10 *course it is, princess,"* MV8 responded again asking, *"are you sure it's oki?"* and PARK  
11 again responded, *"Yes, absolutely, princess:) Just as long as you're a good girl and don't*  
12 *tell anyone."*

13 75. PARK later disclosed to MV8 that he was sexually attracted to "younger  
14 girls" and that he had previously dated other teenage girls. PARK then went on to ask  
15 MV8 about other adult men that she had previously dated, asking, *"Did you send him*  
16 *nudes"* and when MV8 stated she had, PARK responded, *"I'm getting jealous now:/ But*  
17 *I understand."* PARK also asked, *"Did you take pics for him in cute outfits, princess"* to  
18 which MV8 responded that she had, and PARK replied, *"I want that."* MV8 later asked  
19 if PARK would be willing to visit her and asked what would happen if she were to tell  
20 anyone about PARK talking to her. PARK responded, *"Hmm I'd have to punish you,*  
21 *princess, And teach you a lesson."* PARK elaborated saying, *"I might have to make you*  
22 *do things you don't want to, princess,"* adding, *"Like making you get on your knees with*  
23 *your hands tied behind your back:) Or bending you over my lap, while you're wearing a*  
24 *skirt and cute socks, and spanking you...:) Or making you stand face against a wall, with*  
25 *your hands pressed against the wall, while wearing a skirt with your cutest panties, And*  
26 *letting me do whatever I want behind you."*

76. In further conversation it appeared that PARK and MV8 engaged in a video or audio call and the conversation continued to be sexual in nature. In later messages, PARK told MV8 that he had been feeling guilty saying, *“Been thinking about texting you but holding back, Because of guilty thoughts I wish I could explain better,”* adding, *“Because you’re a minor and it’s illegal what I want to do with you.”* In another section of the chat, PARK told MV8, *“I want to rub my cock while thinking about molesting you.”* Some of the account information for MV8 provided by Discord in CyberTip 170869992 is as follows:

**MV8**

Account ID: 1002455100930916432

Username: juliettqr#0000

Time period: August 3, 2022, through April 19, 2023, UTC

**PARK’S COMMUNICATION WITH MV9 ACCOUNT**

77. In CyberTip 170869992, Discord reported several chats between PARK, using SUBJECT ACCOUNT 1, and suspected minor children, including the chat messages between PARK and MV9 from August 2022. PARK asked MV9 her age and MV9 replied that she was 13 years old. PARK mentioned, *“I bet you look cute in a skirt :))”* and later asked MV9 for a photo of herself. PARK also followed up by asking, *“Do you have any full body pics / mirror selfies”* but MV9 declined to send any images to PARK. PARK’s repeated requests for photos from MV9 after learning she was a minor demonstrates a sexualized interest in minors and evidences a pattern of grooming behavior. Some of the account information for MV9 provided by Discord in CyberTip 170869992 is as follows:

**MV9**

Account ID: 901107917091143760

Username: oakley73728#0000

Time period: August 3, 2022, through August 3, 2022, UTC

**PARK'S COMMUNICATION WITH MV10 ACCOUNT**

78. In CyberTip 170869992, Discord reported several chats between PARK, using SUBJECT ACCOUNT 1, and suspected minor children, including the chat messages between PARK and MV10 spanning from August 2022 to October 2022. PARK reached out to MV10 first saying that he saw her introduction, however age was not discussed early in the messages. Four days into messaging, PARK was the first to bring up age and appeared to have already been aware of MV10's age since the beginning of the conversation, saying, "*You're 13, right?*" to which MV10 responds, "*Mhm almost 14.*"

79. Just prior to confirming MV10's age PARK wrote, "*I'm looking at your pics now and it makes me hmm,*" adding, "*It makes my cock really big and hard, princess.*" When MV10 asked why, PARK responded, "*Because I think you're so cute and pretty, And I like younger girls like you,*" adding, "*And I wish I could touch your pretty little body, I wish I could feel your legs up and down.*" PARK proceeded to tell MV10 what he would do if they met in-person, saying, "*I would definitely put my hand on your thigh, princess,*" adding, "*Then I'd slowly slide my hand up your thighs up your skirt,*" and, "*I would slide my hand slowly up between your thighs until my fingers were softly touching your panties, princess*" and, "*Then I'd softly rub and poke you in the middle of your panties with my fingers :)*" and adding, "*Then I'd slowly pull your panties to the side and softly start fingering your tight little pussy.*" Some of the account information for MV10 provided by Discord in CyberTip 170869992 is as follows:

**MV10**

Account ID: 944945896842485810

Username: sigsaftersex#0000

Time period: August 6, 2022, through October 26, 2022, UTC

//

//

**PARK'S COMMUNICATION WITH MV11 ACCOUNT**

80. In CyberTip 170869992, Discord reported several chats between PARK, using SUBJECT ACCOUNT 1, and suspected minor children, including the chat messages between PARK and MV11 spanning from August 2022 to May 2023. In PARK's second message to MV11, PARK asked MV11's age and MV11 responded that she is 13 years old. Shortly thereafter the conversation appeared to turn sexual. While the messages do not appear to show a complete transcript of the conversation, based on the context, it appeared PARK and MV11 discussed taking photos of MV11. The following is an excerpt from the messages between MV11 and PARK beginning around August 6, 2022, at 12:51:13 UTC.

SUBJECT ACCOUNT 1: Have you ever met an older man from online irl

MV11: noooo it's so scary

MV11: I haven't even talked to one yet

MV11: they would have to be hot older man

MV11: whaaat

MV11: how could we even do that my parents are so strick

MV11: our house covered in cameras and alarms

SUBJECT ACCOUNT 1: Hmm it can done if we come up with a good plan

MV11: how many girls have you met?

SUBJECT ACCOUNT 1: A lot

MV11: well as long as the pics and vids don't go anywhere

SUBJECT ACCOUNT 1: Of course, for sure

SUBJECT ACCOUNT 1: I'm way too paranoid, I'd get in trouble

SUBJECT ACCOUNT 1: If I let them out

MV11: what's spacecowboy look like

SUBJECT ACCOUNT 1: Want to see my cock, princess

MV11: yes yes yes



1 MV11: i do

2 SUBJECT ACCOUNT 1: Good girl:) one sec

3 SUBJECT ACCOUNT 1: It didn't let me send it

4 SUBJECT ACCOUNT 1: Got snap?

5 MV11: i dooo

6 [08-06-2022 13:08:03 UTC]

7 81. Some of the account information for MV11 provided by Discord in  
8 CyberTip 170869992 is as follows:

9 **MV11**

10 Account ID: 1005404868258840668

11 Username: princessvi0let#0000

12 Time period: August 6, 2022, through May 14, 2023, UTC

13 **PARK'S COMMUNICATION WITH MV14<sup>5</sup> ACCOUNT**

14 82. In CyberTip 170721846, Discord reported a chat between PARK, using  
15 SUBJECT ACCOUNT 1, and a suspected minor child, MV14, with messages spanning  
16 from March 2022 to April 2022. PARK asked MV14 for a photo of herself, and MV14  
17 responded with a selfie-style image and told PARK, *"But I should warn you I'm 17 and  
18 just wanna make sure ur comfy with that :0!"* PARK replied, *"And yes, I'm ok with that,  
19 if you're ok with me being older."* PARK talked about MV14 modeling for him and  
20 offered to buy MV14 stockings if they hung out. MV14 said she would have to give  
21 PARK a gift in return, to which PARK responded, *"No. You're gift would be to model in  
22 them for me. And let me take pics of you:)." PARK also added, "Hmm I bet you look cute  
23 in pink panties and thigh highs. Or white too:)),"* to which MV14 responded, *"Ooh I  
24 have some pink panties : D!!"* and PARK replied, *"Aw wish I could see them, princess."*  
25 When MV14 responded that she would send PARK a photo, PARK responded, *"That's a*

26  
27 <sup>5</sup> MV12 and MV13 accounts are associated to Instagram and the account data has already been requested in a separate search warrant.



1 *good girl. You're such a good little girl. :)).*" PARK continued to ask for photos of  
2 MV14 including instructing MV14 to produce CSAM to send him, saying things like, "*I*  
3 *want to see another pic with your panties pulled down, princess,*" "*Then take another*  
4 *one with your legs spread, sitting on your bum, princess, and take one where you pull*  
5 *your panties to the side can you do all that for me princess.*" A separate CyberTip  
6 170717225 was reported by Discord regarding CSAM images sent by MV14's account  
7 that match the images sent to PARK, and correspond to the poses PARK requested.

8 83. PARK also discussed meeting up with MV14 in-person, at one point  
9 saying, "*You can help by letting me visit you, and pick you up, princess.*" PARK went on  
10 to tell MV14 what he intended to do when they met up, saying, "*I'm going to caress your*  
11 *pretty legs up and down slide my hand up your thighs up your skirt, then further to the*  
12 *middle of your panties So I can feel how soft they are,*" adding, "*Cuz then I'd slowly*  
13 *caress your nervous thighs then slide my hand to the middle of your panties again, and*  
14 *I'd softly rub you in the middle of your panties, princess,*" and, "*Then I'd pull your*  
15 *panties down, or to the side and gently finger your tight little pussy, princess.*" PARK  
16 added, "*I want to bend you over, grope you, finger you, and play with your pretty little*  
17 *body, princess*" and, "*I want to fuck all your pretty little holes, princess.*" MV14  
18 provided the address to a nearby park in Richland, Washington for PARK to meet her at,  
19 and PARK discussed finding a local motel for the two of them to stay at. Based on the  
20 context of later chats, it appeared PARK and MV14 had sexual contact in-person on or  
21 about March 22, 2022. Some of the account information for MV14 provided by Discord  
22 in CyberTip 170721846 is as follows:

23 **MV14**

24 Account ID: 953067175936135178

25 Username: Deleted User 1540e08b#6336

26 Time period: March 17, 2022, through April 2, 2022, UTC  
27

**PARK'S DISCORD COMMUNICATION USING SUBJECT ACCOUNT 2 WITH  
MV 15-23**

84. CyberTip 171040890 was reported by Discord on or about August 17, 2023, and reported eight message threads between SUBJECT ACCOUNT 2 and suspected minor children, identified as MV15 through MV22. The reported message threads dates span from approximately 2019 to 2022 and the reported conversations appear to be predominantly sexual in nature or appear to show SUBJECT ACCOUNT 2 engaging in grooming behaviors with the MV accounts as detailed below.

85. Two other CyberTips were filed by Discord under CyberTip 171040138, and 52961381. CyberTip 171040138 was reported by Discord relating to a message thread between PARK and another suspected minor child identified as MV23. CyberTip 52961381 was filed by Discord relating to CSAM files that were shared by the MV22 ACCOUNT on or about the same date that PARK had been messaging MV22 about CSAM on Discord.

86. Based on CyberTips 171040890, 171040138, and 52961381, SUBJECT ACCOUNT 2 appears to have messaged several accounts belonging to suspected minors. PARK used SUBJECT ACCOUNT 2 to ask children to model for him, received sexually explicit images from children, and talked about his desired sexual contact with the minor children. PARK also used SUBJECT ACCOUNT 2 to meet up with some of the minor children in person.

**PARK'S COMMUNICATION WITH MV15**

87. In CyberTip 171040890, Discord reported several chats between PARK, using SUBJECT ACCOUNT 2, and suspected minor children, including the chat messages between PARK and MV15 spanning from June 2019 to July 2019. In the chat it appears that PARK had previously met MV15 on Omegle, another video chat platform. While age was not mentioned early in the Discord chat by MV15, she wrote that she was on summer break and was not looking forward to starting middle school. MV15 later

1 mentioned that she was going to Korea for part of the summer and wrote that she was not  
 2 looking forward to the trip because she believed she needed to have sex while she was  
 3 there. PARK's response to this was, *"I'm Korean and I'd fuck you tbh."* PARK's follow  
 4 up to that comment was, *"Did you know i was hard when we chatted on Omegle"* to  
 5 which MV15 replied, *"yes."* PARK then asked, *"Do you like seeing dicks little girl"* to  
 6 which MV15 replied, *"stop."* PARK asked MV15 if she still danced and said he would  
 7 like to see her dance, but when MV15 said no, PARK replied, *"I'm not asking I'm just*  
 8 *saying,"* adding, *"Tbh I've had other girls your age dance for me though"* and *"I've had*  
 9 *girls your age model for me too... You should see my pics... you'd be really good."*

10 88. Later messages between MV15 and PARK are more sexually graphic and  
 11 PARK was the first to acknowledge MV15's age while making the following sexual  
 12 remark, *"I'd dress you up like a little 11 year old slut that you are and fuck you hard."*  
 13 The following is an excerpt from the messages between MV15 and PARK beginning on  
 14 or around June 30, 2019, at 07:17:24 UTC.

15 MV15: id like you choking me

16 SUBJECT ACCOUNT 2: Yes it makes me want to call you princess and other  
 17 things

18 SUBJECT ACCOUNT 2: Fuck I'd like that to

19 MV15: yes]

20 MV15: pound baby girl

21 SUBJECT ACCOUNT 2: I'd pound the fuck outta little baby girl

22 MV15: mhm

23 SUBJECT ACCOUNT 2: You should see my pics...

24 MV15: fuck me

25 SUBJECT ACCOUNT 2: So do you wanna be my little baby girl slut

26 MV15: mhm

1 SUBJECT ACCOUNT 2: I'd dress you up like a little 11 year old slut that you are  
2 and fuck you hard

3 MV15: yes

4 MV15: daddy

5 SUBJECT ACCOUNT 2: I'd pull your hair, make you suck my cock, choke you,  
6 finger you, then fuck your pretty little pussy until you cried

7 MV15: yesssss

8 MV15: but i like my hair

9 SUBJECT ACCOUNT 2: Don't every, I like your hair too princess, I won't pull it  
10 out (:

11 SUBJECT ACCOUNT 2: I'm looking at your pics on IG and I'm hard af thinking  
12 about raping and molesting you

13 [Timestamp 06/30/2019 07:44:10 UTC]

14 89. Some of the account information for MV15 provided by Discord in  
15 CyberTip 171040890 is as follows:

16 **MV15**

17 Account ID: 359171244014174217

18 Username: selena0562#5935

19 Time period: June 16, 2019, through July 5, 2019, UTC

20 **PARK'S COMMUNICATION WITH MV16 ACCOUNT**

21 90. In CyberTip 171040890, Discord reported several chats between PARK,  
22 using SUBJECT ACCOUNT 2, and suspected minor children, including the chat  
23 messages between PARK and MV16 spanning from April 2021 to June 2022. While  
24 MV16's early messages to PARK were not visible in the chat data provided by Discord  
25 in CyberTip 171040890, PARK acknowledged MV16 was in high school. As of January  
26 2024, MV16 has been identified and participated in a forensic interview whereupon  
27

1 MV16 confirmed she was a minor when she had contact with PARK both online and in-  
2 person.

3 91. The Discord messages between PARK and MV16 contain sexually explicit  
4 conversations in which PARK discusses his desired sexual contact with MV16 such as,  
5 *“You have such a pretty little ass princess I want to bend you over and fuck you real*  
6 *good,”* and *“Can’t stop thinking about fucking you.”* MV16 sent CSAM to PARK in the  
7 Discord chat. MV16 has since identified herself in the images and confirmed she was a  
8 minor at the time. Some of the account information for MV16 provided by Discord in  
9 CyberTip 171040890 is as follows:

10 **MV16**

11 Account ID: 804463761603821578

12 Username: Buttons#8174

13 Time period: April 6, 2021, through June 26, 2022, UTC

14 **PARK’S COMMUNICATION WITH MV17 ACCOUNT**

15 92. In CyberTip 171040890, Discord reported several chats between PARK,  
16 using SUBJECT ACCOUNT 2, and suspected minor children, including the chat  
17 messages between PARK and MV17 from September 2019. PARK asked MV17 for  
18 photos of herself and sent a selfie of himself to MV17. The photos sent by MV17 were of  
19 a female child that appeared to be between 9 and 11 years old based on her small size and  
20 stature and youthful features. After receiving multiple pictures from MV17, PARK asked  
21 MV17 how old she was, to which MV17 told PARK to guess. PARK responded saying,  
22 *“I’d say 10 or 11... or 9?”* to which MV17 replied that she was 10. PARK replied, *“Well*  
23 *even though you’re only 10 I still think you’re very cute ><.”* Later in conversation after  
24 discussing MV17’s age, PARK asked MV17, *“Hmm may I ask some personal*  
25 *questions?”* adding, *“do you have any hair yet?”* to which MV17 replied, *“nope, is that*  
26 *ok.”* PARK then responded, *“Yes of course it’s ok, princess, I wish I could see tbh.”*  
27

1 Some of the account information for MV17 provided by Discord in CyberTip 171040890  
2 is as follows:

3 **MV17**

4 Account ID: 617385349693571129

5 Username: meisie#5714

6 Time period: September 3, 2019, through September 6, 2019, UTC

7 **PARK'S COMMUNICATION WITH MV18 ACCOUNT**

8 93. In CyberTip 171040890, Discord reported several chats between PARK,  
9 using SUBJECT ACCOUNT 2, and suspected minor children, including the chat  
10 messages between PARK and MV18 from August 2021. PARK asked MV18 her age and  
11 MV18 responded that she was 15 years old. Immediately after MV18 told PARK her age,  
12 PARK asked, *"You have experience with older guys?"* to which MV18 responded, *"Uh*  
13 *yea when i was 13 I was groomed and dated a 22 year old... And last year I met a 19*  
14 *year old he was in love with me but ofc age but we would rp sexually and then another*  
15 *guy 20 so uhm.. Yea."* Later in the conversation, PARK told MV18, *"When I was 24 I*  
16 *dated a 15 year old we met in person and everything and dated for years. I met her*  
17 *parents too."* PARK proceeded to ask MV18 for photos of herself, when MV18 provided  
18 a selfie photo, PARK repeatedly asked for more photos. MV18 responded that she was  
19 hesitant to send more photos because she did not know PARK's exact age to which  
20 PARK responded, *"I'm kind of hesitant to tell you my real age because I want to keep*  
21 *chatting to you."* Some of the account information for MV18 provided by Discord in  
22 CyberTip 171040890 is as follows:

23 **MV18**

24 Account ID: 474369899196710912

25 Username: \_moonplayz\_#0000

26 Time period: August 27, 2021, through August 27, 2021, UTC

27 **PARK'S COMMUNICAITON WITH MV19 ACCOUNT**



94. In CyberTip 171040890, Discord reported several chats between PARK, using SUBJECT ACCOUNT 2, and suspected minor children, including the chat messages between PARK and MV19 from April 2021. PARK asked MV19 her age and MV19 responded, *"i'm 13 almost 14!"* to which PARK responded, *"Cool (: I'm a lot older."* After learning MV19's age, PARK asked for a photo of MV19, but MV19 responded, *"i don't feel comfy with that!"* PARK followed up by asking if MV19 had a boyfriend, and when MV19 stated that she did, PARK largely disengaged from further conversation. PARK's requests for photos of MV19 and inquiries into her boyfriend status thereafter demonstrates a sexualized interest in minors and a pattern of grooming behavior. Some of the account information for MV19 provided by Discord in CyberTip 171040890 is as follows:

**MV19**

Account ID: 535659168410107906

Username: netz#4199

Time period: April 6, 2021, through April 12, 2021, UTC

**PARK'S COMMUNICATION WITH MV20 ACCOUNT**

95. In CyberTip 171040890, Discord reported several chats between PARK, using SUBJECT ACCOUNT 2, and suspected minor children, including the chat messages between PARK and MV20 from April 2021. MV20 told PARK that she was 13 years old. The messages provided in the CyberTip appeared to be disjointed, with the end of the conversation between PARK and MV20 going from signing off with PARK saying, *"I'm usually available for chat. Until next time!"* to MV20 replying *"I don't really have any Selfies but maybe I'll take one later."* While the message requesting photos from MV20 does not appear in the CyberTip report, based on the context of MV20's response and the pattern of PARK's behavior as detailed above, it appears that PARK asked MV20 for photos after learning she was a minor. The interaction demonstrates PARK's sexual interest in minors and a pattern of grooming behavior.



1 Some of the account information for MV20 provided by Discord in CyberTip 171040890  
2 is as follows:

3 **MV20**

4 Account ID: 544537243755479050

5 Username: charityy#0000

6 Time period: April 6, 2021, through April 6, 2021, UTC

7 **PARK'S COMMUNICATION WITH MV21 ACCOUNT**

8 96. In CyberTip 171040890, Discord reported several chats between PARK,  
9 using SUBJECT ACCOUNT 2, and suspected minor children, including the chat  
10 messages between PARK and MV21 spanning from April 2021 to July 2021. The  
11 messages between PARK and MV21 appeared to be incomplete, with no clear mention of  
12 MV21's age. However, MV21 sent selfie style images to PARK that depict a female  
13 child, who appears to be approximately between 12 to 14 years old based on her youthful  
14 facial features. Later in the conversation, MV21 and PARK appeared to be in an  
15 argument and PARK told MV21 he was going to block her, to which MV21 responded,  
16 *"uh gonna report you. for talking to a minor,"* to which PARK responded, *"Don't, Just*  
17 *quit calling me from your group chat."* Throughout the chat, most of PARK's messages  
18 to MV21 appeared to be missing, making it difficult to discern the full context of the  
19 communications. However, there were sexually inappropriate messages from MV21 to  
20 PARK, including, *"daddy I'm rlly horny rn," "Daddy do you want a kid soon,"* and *"Abt*  
21 *to masterbate."* Based on MV21's other visible responses, it appears that PARK  
22 originally provided some response in between MV21's various messages, as MV21's  
23 messages typically indicated responses to questions such as, *"Yep," "Okie,"* or, *"No I'm*  
24 *not."* However, PARK's corresponding messages were not visible. MV21 also brought  
25 up on more than one occasion the idea of PARK picking her up or meeting in person.  
26 Based on the lack of PARK's responses in the message thread, it is unclear at this time  
27

whether a meet-up occurred. Some of the account information for MV21 provided by Discord in CyberTip 171040890 is as follows:

**MV21**

Account ID: 486332388742529025

Username: vars0n#0000

Time period: April 7, 2021, through July 1, 2021, UTC

**PARK'S COMMUNICATION WITH MV22 ACCOUNT**

97. In CyberTip 171040890, Discord reported several chats between PARK, using SUBJECT ACCOUNT 2, and suspected minor children, including the chat messages between PARK and MV22 spanning from May 2019 to June 2019. PARK asked MV22's age and MV22 responded that she was 12 years old. It appeared that PARK had previously met MV22 on another social media platform called "Kids Chat.". MV22 implied that "Kids Chat" was for users 18 years old and younger, to which PARK admitted he was older and was sexually attracted to young girls. Later in the chat, PARK asked MV22 for photos and made references to wanting MV22 to model for him. Additionally, after knowing MV22's age, based on the context of the Discord chat, PARK appeared to have sent MV22 CSAM via email on or about June 30, 2019. The following are excerpts from the messages between SUBJECT ACCOUNT 2 and MV22.

[Timestamp 05/25/2019 20:32:19 UTC]

DISCORD 2: Hi

SUBJECT ACCOUNT 2: I think i added you off kidschat

MV22: Oh okay hi

MV22: What was your kc username?

SUBJECT ACCOUNT 2: It was TheFade. I'm not on there much though.

MV22: Ohhh okay

MV22: never heard of it tho lmao

SUBJECT ACCOUNT 2: Lol ya do you go on there a lot?

1 MV22: Yeah

2 [Timestamp 05/25/2019 20:41:49 UTC]

3 [...]

4 [Timestamp 05/25/2019 20:44:18 UTC]

5 MV22: but my Nickname is Fish

6 SUBJECT ACCOUNT 2: What's your asl? If you don't mind.

7 SUBJECT ACCOUNT 2: Lol cute. Do you swim a lot of something

8 MV22: I'm 12, F, canada

9 SUBJECT ACCOUNT 2: Oof, ok (:

10 [...]

11 MV22: may i ask what your age is?

12 SUBJECT ACCOUNT 2: lol thanks. Gah I don't wanna scare you away cuz you  
13 seem nice.

14 SUBJECT ACCOUNT 2: Cuz im considerably older...

15 MV22: Oh okay no problem

16 MV22: but under 19 considering you are still on kc right?

17 SUBJECT ACCOUNT 2: No I'm older ><

18 SUBJECT ACCOUNT 2: People tell me I look you g for my age

19 MV22: Oh oof

20 SUBJECT ACCOUNT 2: Tbh seems like there's lots of older guys who go on kc

21 MV22: yeah ik

22 MV22: honestly most are just pedophiles

23 MV22: especially the guests

24 SUBJECT ACCOUNT 2: Yeah I figured

25 SUBJECT ACCOUNT 2: To be really honest im basically one too... that's why I  
26 was on there

27 MV22: Uh

1 SUBJECT ACCOUNT 2: I'm not like the idiots that you've seen on kc though

2 MV22: What do you mean by that?

3 MV22: like

4 MV22: idiotic in which way

5 SUBJECT ACCOUNT 2: I mean like blatantly perverted

6 SUBJECT ACCOUNT 2: I date women my age too but I'm also attracted to

7 younger girls, that's all I'm saying

8 MV22: Oh uh okay

9 SUBJECT ACCOUNT 2: Lol sorry for creeping you out. Just being honest

10 [...]

11 [Timestamp 06/30/2019 07:17:40 UTC]

12 SUBJECT ACCOUNT 2: Lol great username

13 MV22: Lmao thanks

14 SUBJECT ACCOUNT 2: Yw (: so why are you up now young lady

15 MV22: Eh I usually stay up

16 SUBJECT ACCOUNT 2: Same. I forgot you're 12 right

17 MV22: Yeah

18 SUBJECT ACCOUNT 2: Isn't that a little young to be naming yourself emo

19 whore haha

20 MV22: Nah lmao

21 SUBJECT ACCOUNT 2: Lol ya ok. I guess not.

22 MV22: Yep

23 SUBJECT ACCOUNT 2: Hm are you really a whore though lol

24 MV22: Uh people def see me as one

25 [...]

26 SUBJECT ACCOUNT 2: Do you like knee high and thigh high socks!

27 MV22: Uh I guess

1 SUBJECT ACCOUNT 2: Do you have any skirts you like

2 MV22: Nope

3 MV22: I don't usually wear skirts

4 SUBJECT ACCOUNT 2: I'm going to make you wear a skirt one day

5 MV22: Lmao okay

6 SUBJECT ACCOUNT 2: And imma take pics too

7 MV22: Ooof

8 MV22: Wait

9 MV22: how old are you again?

10 SUBJECT ACCOUNT 2: Lol well I'm older...

11 MV22: Like.. how old

12 SUBJECT ACCOUNT 2: I don't wanna like scare you away

13 MV22: I talked to older guys before lmao, I'm not scared

14 MV22: I won't block you or anything

15 SUBJECT ACCOUNT 2: Cool (: well I'm over 30...

16 MV22: Ooof okay

17 SUBJECT ACCOUNT 2: People think I'm younger all the time but yea oof

18 MV22: Why did you go on kidschat when you only associate with dumb 13 year-  
19 olds?

20 SUBJECT ACCOUNT 2: Lol I don't go on there a lot

21 MV22: Oh okay

22 SUBJECT ACCOUNT 2: I'll be completely honest I'm attracted to girls that age

23 MV22: Oh okay oof

24 SUBJECT ACCOUNT 2: I'm kinduva lolicon

25 MV22: Wait what's that again?

26 SUBJECT ACCOUNT 2: An older man who likes young girls basically p

27 MV22: Oh mmk

1 SUBJECT ACCOUNT 2: Tbh I've met and done things with girls your age

2 MV22: Damn oof

3 SUBJECT ACCOUNT 2: Yeah ikr... I've taken pics and vids of it too...

4 MV22: Damn..

5 MV22: Why though?

6 SUBJECT ACCOUNT 2: Tbh I get off on it and jerk off to them later

7 MV22: Oooofff

8 MV22: Have you like.. ever got caught?

9 SUBJECT ACCOUNT 2: No I haven't

10 SUBJECT ACCOUNT 2: Otherwise I wouldn't be here to chat with you rn haha

11 MV22: Yeah true hah

12 SUBJECT ACCOUNT 2: And tbh I know the girls all liked it cuz they want more  
13 and they keep it a secret

14 MV22: Oof.. they did?

15 SUBJECT ACCOUNT 2: Yes

16 SUBJECT ACCOUNT 2: I could even show you pics, but... ya

17 MV22: Lmao I dare you

18 MV22: prove itttt

19 SUBJECT ACCOUNT 2: Lol hmmm not on here

20 SUBJECT ACCOUNT 2: I'll get banned if I share those with you on here

21 MV22: Oh okay

22 [...]

23 SUBJECT ACCOUNT 2: I would show you if you promised not to tell your  
24 jealous bf lol

25 MV22: I swear I won't lmao

26 MV22: I dont break promises

27 SUBJECT ACCOUNT 2: lol ya right

1 MV22: I promise lmao

2 MV22: I don't break promises

3 SUBJECT ACCOUNT 2: Do you have Snapchat

4 MV22: Nope

5 MV22: do you have hangouts?

6 SUBJECT ACCOUNT 2: Yeah...

7 MV22: Kk

8 MV22: what is it

9 SUBJECT ACCOUNT 2: Just tell me ur email and I'll email them to you

10 MV22: jolenegauvreau98@gmail.com

11 SUBJECT ACCOUNT 2: Ok it might take a while

12 MV22: Kk

13 SUBJECT ACCOUNT 2: Will you at least show me a pic of you

14 MV22: sure

15 MV22: just wait

16 SUBJECT ACCOUNT 2: I have to warn you these pics are really graphic/sexual

17 MV22: I guessed

18 MV22: [Sends image titled avatar\_user1002605\_7034720395039536.jpg. The

19 image shows a female child's face with her chin resting on the child's left hand.

20 The child appears to be wearing a purple shirt. Based on the child's youthful

21 features, the child appears to be approximately 11-13 years old.]

22 MV22: that's me

23 SUBJECT ACCOUNT 2: Aw you look like an angel

24 MV22: Thanks XD

25 MV22: Did they send?

26 SUBJECT ACCOUNT 2: Sorry I'm having issues accessing them I'm still looking

27 MV22: Okey



1 SUBJECT ACCOUNT 2: May I see another pic of you

2 MV22: I don't have another one. I just started getting my stuff back on my  
3 computer

4 SUBJECT ACCOUNT 2: K I sent one...

5 SUBJECT ACCOUNT 2: Promise to be a good little girl and not show or tell  
6 anyone

7 MV22: I won't

8 MV22: I promise

9 SUBJECT ACCOUNT 2: Did you see the first one I sent

10 MV22: Yeah

11 MV22: You sent more?

12 SUBJECT ACCOUNT 2: I will

13 SUBJECT ACCOUNT 2: What did you think though

14 MV22: Uh idk, am I supposed to think something?

15 SUBJECT ACCOUNT 2: Lol no

16 SUBJECT ACCOUNT 2: Do you want to see more though

17 MV22: Yeah

18 SUBJECT ACCOUNT 2: Did you like the first pic

19 MV22: mhm

20 SUBJECT ACCOUNT 2: Good (:

21 SUBJECT ACCOUNT 2: I could even show you videos but idk...

22 MV22: Sure

23 SUBJECT ACCOUNT 2: I sent another one...

24 SUBJECT ACCOUNT 2: Can you guess what's on her panties

25 MV22: Obviously cum lmao

26 SUBJECT ACCOUNT 2: Lol they were cute panties

27 MV22: yeah

1 SUBJECT ACCOUNT 2: Would you let me cum on your panties like that lol

2 MV22: Idk

3 SUBJECT ACCOUNT 2: Did you like that pic too

4 MV22: Yeah

5 MV22: first one was better tho

6 SUBJECT ACCOUNT 2: I could show you more but she's really young...

7 MV22: weren't the last ones already young? I don't think it matters tbh

8 SUBJECT ACCOUNT 2: Yeah true and thx

9 MV22: np

10 SUBJECT ACCOUNT 2: K I sent more

11 MV22: kk

12 SUBJECT ACCOUNT 2: So are you showing people

13 MV22: No

14 MV22: Why would I

15 SUBJECT ACCOUNT 2: Did you get the last set

16 MV22: Yeah

17 MV22: how old was she?

18 SUBJECT ACCOUNT 2: What would you guess

19 MV22: 8?

20 SUBJECT ACCOUNT 2: No 10 or 11

21 SUBJECT ACCOUNT 2: She was really petite

22 MV22: I noticed yeah

23 SUBJECT ACCOUNT 2: Did you like the pics though

24 MV22: Yeah

25 SUBJECT ACCOUNT 2: Do you still want to see more then

26 MV22: Definitely

27 SUBJECT ACCOUNT 2: Tbh I wish I could take pics with you

1 MV22: Oof okay

2 SUBJECT ACCOUNT 2: I really mean that especially after seeing your pic

3 MV22: yeah

4 SUBJECT ACCOUNT 2: Is there any part of you that would like that

5 MV22: I don't know

6 SUBJECT ACCOUNT 2: I sent a couple more

7 SUBJECT ACCOUNT 2: I had to edit the environment on one of them

8 MV22: Oh, why's that?

9 SUBJECT ACCOUNT 2: Eh to hide things

10 SUBJECT ACCOUNT 2: Do you see it

11 MV22: yeah

12 SUBJECT ACCOUNT 2: I liked her piglet socks (:

13 MV22: Yeah

14 SUBJECT ACCOUNT 2: I sent more

15 SUBJECT ACCOUNT 2: I met these girls off an app and they basically let me do  
16 anything to them...

17 MV22: Wow

18 SUBJECT ACCOUNT 2: Yeah... do you like it

19 MV22: I didn't open them yet

20 SUBJECT ACCOUNT 2: Let me know what you think of them

21 MV22: How ol were the girls?

22 MV22: old\*

23 SUBJECT ACCOUNT 2: How old do you think

24 MV22: 13?

25 SUBJECT ACCOUNT 2: Yeah

26 MV22: oof

27 SUBJECT ACCOUNT 2: Do you like those pics

1 MV22: Yeah

2 SUBJECT ACCOUNT 2: Do you really mean that

3 MV22: Yeah

4 SUBJECT ACCOUNT 2: Btw what state do you live in

5 MV22: I live in Canada

6 SUBJECT ACCOUNT 2: Cool which part?

7 MV22: Sask.

8 SUBJECT ACCOUNT 2: Would be nice to visit you there and do this with you  
9 too (:

10 [Timestamp 06/30/2019 09:58:57 UTC]

11 98. Some of the account information for MV22 provided by Discord in  
12 CyberTip 171040890 is as follows:

13 **MV22**

14 Account ID: 555186377029844992

15 Username: Deleted User 0c25c2aa#5200

16 Time period: May 25, 2019, through June 30, 2019, UTC

17 **PARK'S COMMUNICATION WITH MV23 ACCOUNT**

18 99. In CyberTip 171040138, Discord reported a chat between PARK, using  
19 SUBJECT ACCOUNT 2, and a suspected minor child, MV23, with messages spanning  
20 from March 2018 to May 2021. Based on the messages, it appeared that PARK met  
21 MV23 previously on a separate platform. While age was not initially mentioned in the  
22 Discord chat between PARK and MV23, early in the Discord messages PARK implied  
23 that he was aware of MV23 being a minor by saying, *"do you like dressing and acting*  
24 *like a cute little girl like that, princess? Well, you are a little girl... but ya."* PARK also  
25 wrote, *"I remember you said you look like 11."* Several messages later, PARK asked  
26 MV23, *"Can I ask you something personal...have you ever though about giving*  
27 *blowjobs, princess?"* adding, *"You'd look so cute while giving me a blowjob, if you*

1 *would.*” Based on the messages, it appeared that PARK and MV23 had already made  
 2 tentative plans to meet in person. PARK described some of what he intended to do asking  
 3 MV23, *“what if I jerked off in the same room as you., would that scare you princess?”* to  
 4 which MV23 replied, *“no,”* and PARK responded, *“K good, cuz I might want to this*  
 5 *Tuesday.”* PARK also asked MV23, *“how much hair do you have under your panties,*  
 6 *princess?”* to which MV23 said, *“that’s a secret x3,”* and PARK responded, *“Ok maybe*  
 7 *a secret I can find out.”*

8 100. PARK repeatedly wrote about wanting to have sexual contact with MV23.  
 9 At one point after discussing the sexual contact he wanted to have with MV23, PARK  
 10 was the first person to bring up MV23’s age in the Discord chat, mentioning, *“So, are*  
 11 *you in 8<sup>th</sup> grade right now?”* to which MV23 responded, *“yeah I’m in 8<sup>th</sup> grade.”* The  
 12 following is an excerpt from the messages between PARK and MV23 from April 13,  
 13 2018, from approximately 05:44:42 UTC to 16:05:23 UTC.

14 SUBJECT ACCOUNT 2: And I think I’ll really like touching you too, princess

15 SUBJECT ACCOUNT 2: I’m sorry if that was too forward. But it’s something I  
 16 think about.

17 MV23: I think about it too x3

18 SUBJECT ACCOUNT 2: Good, if you want you can touch me too, princess

19 MV23: x3 I don’t think I’ll be able to make you feel good though

20 SUBJECT ACCOUNT 2: I think you can, princess. I can teach you

21 SUBJECT ACCOUNT 2: I can teach you how to make me cum

22 SUBJECT ACCOUNT 2: But only if you’re ok with it, princess

23 MV23: yeah I am ok with that x3 whatever I can do to make you happy I will do

24 SUBJECT ACCOUNT 2: That’s a good girl, I’m happy to hear that

25 SUBJECT ACCOUNT 2: I’m already happy that we’re talking and have plans to  
 26 meet

1 SUBJECT ACCOUNT 2: Do you really mean you will do whatever you can to  
2 make me happy, princess?

3 MV23: yes x3

4 SUBJECT ACCOUNT 2: You're such a good girl, even if that means letting me  
5 rub and finger you between your legs, on your panties, princess?

6 MV23: yeah

7 SUBJECT ACCOUNT 2: Good, I like thinking about that a lot, princess

8 SUBJECT ACCOUNT 2: So, are you in 8<sup>th</sup> grade right now?

9 MV23: yeah I'm in 8<sup>th</sup> grade

10 101. Based on the context of the Discord messages, it appeared that PARK and  
11 MV23 met in-person at a park in Puyallup, Washington on or about April 18, 2018. In  
12 later messages from May 2021, PARK reached out to MV23 to revisit their meeting at  
13 the park. PARK mentioned to MV23, *"It's kinda crazy to think about how much time has*  
14 *passed since we met."* When MV23 asked what made PARK think about that, PARK  
15 responded, *"Well, I think about that day sometimes. And I still have the photos I took of*  
16 *you that day."* PARK later acknowledged MV23's age at the time of their meeting  
17 saying, *"I met you when you were 14,"* adding, *"if you didn't have a bf i'd love to meet*  
18 *you again ><."* The following is a chat excerpt from PARK and MV23's messages  
19 reflecting on the in-person meeting in 2018.

20 SUBJECT ACCOUNT 2: Yeah, that was true. Do you remember when we met at  
21 the park?

22 MV23: Yeah

23 MV23: You kept moving your hands down and I was threatening to kick you if  
24 you moved them too far down

25 SUBJECT ACCOUNT 2: Hands down where? I don't remember touching you  
26 much  
27

1 MV23: Nah I was on the swing and you were pushing me. Kept progressively  
2 moving your hands farther down

3 SUBJECT ACCOUNT 2: Yes. I'm sorry.

4 SUBJECT ACCOUNT 2: Did I make you very uncomfortable?

5 MV23: A little, now that I think back on it.

6 SUBJECT ACCOUNT 2: Did part of you like it?

7 SUBJECT ACCOUNT 2: And if you want to stop talking about it, I understand

8 MV23: Um, I don't know.

9 102. As of December 2023, MV23 has been identified and participated in a  
10 forensic interview whereupon MV23 confirmed she was a minor when she had contact  
11 with PARK both online and in-person. MV23 confirmed that she had initially met PARK  
12 on Whisper, another social media platform, before connecting again on Discord. MV23  
13 reported the in-person meeting with PARK was not overtly sexual in nature. MV23  
14 described PARK pushing her on the swings at the park and that his hands progressively  
15 moved lower from her shoulders to touching her lower back, at which point MV23 told  
16 PARK to stop. PARK continued to message MV23 after their initial meeting and stated  
17 that he wanted to have sexual contact with her. Some of the account information for  
18 MV22 provided by Discord in CyberTip 171040138 is as follows:

19 **MV23**

20 Account ID: 272623738695188481

21 Username: semyetra#0000

22 Time period: April 9, 2018, through May 30, 2021, UTC

23 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

24 103. I anticipate executing this warrant under the Electronic Communications  
25 Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by  
26 using the warrant to require Discord to disclose to the government copies of the records  
27 and other information (including the content of communications) particularly described in



1 Section I of Attachments B1-B23. Upon receipt of the information described in Section I  
2 of Attachments B1-B23, government-authorized persons will review that information to  
3 locate the items described in Section II of Attachments B1-B23.

4 //

5 //

**CONCLUSION**

104. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Discord. Because the warrant will be served on Discord, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

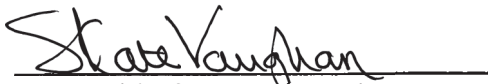
105. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

106. The affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

107. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. Section 2422(b), Enticement of Children and Attempted Enticement of Children, has been committed by Bennett Sung PARK. There is also probable cause to search the information described in Attachments A1-A23 for evidence, instrumentalities, contraband, and fruits of these crimes further described in Attachments B1-B23.

  
Alaina Dussler, Affiant  
Special Agent, HSI

SUBSCRIBED AND SWORN before me via telephone  
this \_\_\_16th\_\_\_ day of February, 2024.

  
Honorable S. Kate Vaughan  
United States Magistrate Judge

**ATTACHMENT A1**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**spacecowboy9261#0000** with user ID **893028927956738089**, email  
**lylaflower49@gmail.com**, and phone number **510-717-9227** that is stored at premises  
owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in  
San Francisco, California.

**ATTACHMENT A2**

**Property to Be Searched**

This warrant applies to information associated with Discord Account username **MoonMan#4642** with user ID **432783654557843456**, email **bennettspark@gmail.com** and phone number **510-717-9227** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

**ATTACHMENT A3**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**baezy\_#0000** with ID **1052882529054642216** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A4**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **mayoxhen#0000** with ID **711460293473075221** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

**ATTACHMENT A5**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**luna9967#0000** with ID **895181087511298068** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.



**ATTACHMENT A6**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**prettygirl2#0000** with ID **826123343622176809** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A7**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**volietnce#0000** with ID **678711470497726485** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A8**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**jo876543#0000** with ID **906379051550248971** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A9**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **Deleted**  
**User d2c0a72c#7499** with ID **1003928511490302002** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A10**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**juliettqr#0000** with ID **1002455100930916432** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A11**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **oakley73728#0000** with ID **901107917091143760** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

**ATTACHMENT A12**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**sigsaftersex#0000** with ID **944945896842485810** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.



**ATTACHMENT A13**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **princessvi0let#0000** with ID **1005404868258840668** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

**ATTACHMENT A14**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **Deleted**  
**User 1540e08b#6336** with ID **953067175936135178** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A15**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**selen0562#5935** with ID **359171244014174217** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A16**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**Buttons#8174** with ID **804463761603821578** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A17**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **meisie#5714** with ID **617385349693571129** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

**ATTACHMENT A18**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
\_moonplayz\_#0000 with ID 474369899196710912 that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A19**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **netz#4199** with ID **535659168410107906** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.



**ATTACHMENT A20**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**charityy#0000** with ID **544537243755479050** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A21**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
vars0n#0000 with ID 486332388742529025 that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT A22**

**Property to Be Searched**

This warrant applies to information associated with Discord Account **Deleted User 0c25c2aa#5200** with ID **555186377029844992** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company headquartered in San Francisco, California.

**ATTACHMENT A23**

**Property to Be Searched**

This warrant applies to information associated with Discord Account  
**semyetra#0000** with ID **272623738695188481** that is stored at premises owned,  
maintained, controlled, or operated by Discord, Inc, a company headquartered in San  
Francisco, California.

**ATTACHMENT B1****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A1

**spacecowboy9261#0000** with ID **893028927956738089**, email

**lylaflower49@gmail.com**, phone number **510-717-9227** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for the user listed in Attachment A1 for the dates of **April 9, 2018, to August 8, 2023**, UTC<sup>6</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, any additional associated accounts;

c. Customer service records: All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or

---

<sup>6</sup> As detailed herein, April 9, 2018, is the first reported date of Discord accounts associated to PARK engaging in sexual messages with alleged minor children on Discord. August 8, 2023, is the most recent reported date PARK engaged in sexual messages with a minor child on Discord.

1 any other issue with the use of or access to the Discord account that were created,  
2 uploaded, adjusted, accessed, used, modified, or deleted;

3 d. Subscriber financial account information and account status history;

4 e. Images: All photos, videos, and other depictions associated with the  
5 account, in any format or media. Law enforcement will search these files and only seize  
6 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
7 demonstrate dominion and control over the account;

8 f. Postings, communications, biographical information, or other  
9 information identifying the suspect account user and/or any other persons transmitting  
10 depictions of minors engaged in sexually explicit conduct or evidencing the transmissions  
11 thereof;

12 g. Usage information detailing how the suspect account interacted with  
13 Discord including which search queries the suspect account user submit;

14 h. Usage information detailing how the suspect account communicated  
15 with other Discord users, such as their names, the time and date of your communications,  
16 the number of messages exchanged with other users, which other users exchanged  
17 messages with the suspect account, and the suspect account's interactions with messages  
18 (such as when the suspect account opened a message or captured a screenshot);

19 i. Content information including information about the content created  
20 or provided by the suspect account, such as if the recipient has viewed the content and the  
21 metadata that is provided with the content;

22 j. Device information documenting the devices used by the suspect  
23 account to include information about the suspect account's hardware and software (to  
24 include hardware model, operating system version, device memory, advertising  
25 identifiers, unique application identifiers, apps installed, unique device identifiers,  
26 browser type, language, battery level, and time zone);

27 k. Device information documenting device sensors, such as  
accelerometers, gyroscopes, compasses, microphones, and whether the suspect account  
has headphones connected;

l. Device information documenting the wireless and mobile network  
connections, to include mobile phone number, service provider, IP address, and signal  
strength;

m. Device information to include device Phonebook data collected, and  
any unique identifiers for devices used to access the account;

1           n.       Device information to include Camera and Photos collected from the  
suspect account's device's camera and photos;

2           o.       Location information about the suspect account's precise location  
3 using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and  
4 other sensors, such as gyroscopes, accelerometers, and compasses;

5           p.       Information collected by cookies and other technologies to include  
information when the suspect account interacted with services Discord offers through one  
6 of its partners, such as advertising and commerce features;

7           q.       Log information such as:

8                   i.       details about how the suspect account used Discord services;

9                   ii.      device information, such as the suspect account's web  
10 browser type and language;

11                  iii.     access times;

12                  iv.     pages viewed;

13                  v.      IP address;

14                  vi.     identifiers associated with cookies or other technologies that  
15 may uniquely identify the suspect account's device or browser; and

16                  vii.    pages the suspect account visited before or after navigating to  
17 Discord's website.

18  
19           r.       Information collected from Third Parties about the suspect account  
20 from other users, Discord affiliates, and third parties to include if the suspect account  
21 linked its Discord account to another service (like Bitmoji or a third-party app) or if  
another user uploads their contact list, Discord may combine information from that user's  
22 contact list with other information Discord have collected about the suspect account.

23           Discord is hereby ordered to disclose the above information to the government  
24 within **14 days** of issuance of this warrant.

25       **II.    Information to be seized by the government**  
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1 All information described above in Section I that constitutes fruits, evidence and  
2 instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and  
3 Attempted Enticement of Children, since the creation of the account, including, for each  
4 user ID identified on Attachment A1, information pertaining to the following matters:

5 a. Evidence identifying the person(s) exercising dominion and control  
6 over the suspect account;

7 b. Financial account information and account status history;

8 c. Evidence indicating the targeting, communication, and solicitation of  
9 children to produce sexually explicit material;

10 d. All photos, videos, and other depictions associated with the account  
11 that depict child pornography defined in 18 U.S.C. § 2256;

12 e. Images associated with the account belonging to the Discord suspect  
13 account user;

14 f. Postings, communications, biographical information, or other  
15 information identifying the suspect account user and/or any other persons transmitting  
16 depictions of minors engaged in sexually explicit conduct, and attempts thereof, or  
17 evidencing the transmissions thereof;

18 g. Usage information evidence and communications between others to  
19 include communications to target minors for sexual and physical extortion or exploitation  
20 (including when the suspect account opened a message or captured a screenshot);

21 h. Evidence indicating how and when the Discord account was  
22 accessed or used, to determine the chronological and geographic context of account  
23 access, use, and events relating to the crime under investigation and to the Discord  
24 account owner;

25 i. Information about the content created or provided by the suspect  
26 account, when the content was viewed and the metadata that is provided with the content;

27 j. Data related to linked services;

1  
2 k. User attribution evidence identifying the account user's devices,  
3 software, sensors, operating version, advertising identifiers, installed applications, unique  
4 identifiers, browser data, time zone, wireless and mobile network connections to include  
5 numbers, providers, IP addresses, and data related thereto;

6  
7 l. Evidence of the Discord account user's state of mind as it relates to  
8 the crimes under investigation;

9  
10 m. The identity of the person(s) who created or used the user ID,  
11 including records that help reveal the whereabouts of such person(s), and to establish  
12 dominion and control over the account during this time period.

13  
14 This warrant authorizes a review of electronically stored information, communications,  
15 other records and information disclosed pursuant to this warrant in order to locate  
16 evidence, fruits, and instrumentalities described in this warrant. The review of this  
17 electronic data may be conducted by any government personnel assisting in the  
18 investigation, who may include, in addition to law enforcement officers and agents,  
19 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
20 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
21 custody and control of attorneys for the government and their support staff for their  
22 independent review.  
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**ATTACHMENT B2****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A2 **MoonMan#4642** with ID **432783654557843456**, email **bennettspark@gmail.com**, and phone number **510-717-9227** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A2 for the dates of **April 9, 2018, to August 8, 2023**, UTC<sup>7</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records: All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

d. Subscriber financial account information and account status history;

e. Images: All photos, videos, and other depictions associated with the account, in any format or media. Law enforcement will search these files and only seize

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<sup>7</sup> As detailed herein, April 9, 2018, is the first reported date of Discord accounts associated to PARK engaging in sexual messages with alleged minor children on Discord. August 8, 2023, is the most recent reported date PARK engaged in sexual messages with a minor child on Discord.

1 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
2 demonstrate dominion and control over the account;

3 f. Postings, communications, biographical information, or other  
4 information identifying the suspect account user and/or any other persons transmitting  
5 depictions of minors engaged in sexually explicit conduct or evidencing the transmissions  
6 thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other users, such as their names, the time and date of your communications, the number  
11 of messages exchanged with other users, which other users exchanged messages with the  
12 suspect account, and the suspect account's interactions with messages (such as when the  
13 suspect account opened a message or captured a screenshot);

14 i. Content information including information about the content created  
15 or provided by the suspect account, such as if the recipient has viewed the content and the  
16 metadata that is provided with the content;

17 j. Device information documenting the devices used by the account to  
18 include information about the account's hardware and software (to include hardware  
19 model, operating system version, device memory, advertising identifiers, unique  
20 application identifiers, apps installed, unique device identifiers, browser type, language,  
21 battery level, and time zone);

22 k. Device information documenting device sensors, such as  
23 accelerometers, gyroscopes, compasses, microphones, and whether the suspect account  
24 has headphones connected;

25 l. Device information documenting the wireless and mobile network  
26 connections, to include mobile phone number, service provider, IP address, and signal  
27 strength;

28 m. Device information to include device Phonebook data collected, and  
29 any unique identifiers for devices used to access the account;

30 n. Device information to include Camera and Photos collected from the  
31 suspect account's device's camera and photos;

32 o. Location information about the suspect account's precise location  
33 using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and  
34 other sensors, such as gyroscopes, accelerometers, and compasses;

1 p. Information collected by cookies and other technologies to include  
2 information when the suspect account interacted with services Discord offers through one  
3 of its partners, such as advertising and commerce features;

4 q. Log information such as:

5 i. details about how the suspect account used Discord services;

6 ii. device information, such as the suspect account's web  
7 browser type and language;

8 iii. access times;

9 iv. pages viewed;

10 v. IP address;

11 vi. identifiers associated with cookies or other technologies that  
12 may uniquely identify the suspect account's device or browser; and

13 vii. pages the suspect account visited before or after navigating to  
14 Discord's website.

15 r. Information collected from Third Parties about the suspect account  
16 from other users, Discord affiliates, and third parties to include if the suspect account  
17 linked it's Discord account to another service (like Bitmoji or a third-party app) or if  
18 another user uploads their contact list, Discord may combine information from that user's  
19 contact list with other information Discord have collected about the suspect account.

20 Discord is hereby ordered to disclose the above information to the government  
21 within **14 days** of issuance of this warrant.

## 22 **II. Information to be seized by the government**

23 All information described above in Section I that constitutes fruits, evidence and  
24 instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and  
25 Attempted Enticement of Children, since the creation of the account, including, for each  
26 user ID identified on Attachment A2, information pertaining to the following matters:

27 a. Evidence identifying the person(s) exercising dominion and control  
over the suspect account;

1                   b.       Financial account information and account status history;

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3                   c.       Evidence indicating the targeting, communication, and solicitation of  
4 children to produce sexually explicit material;

5                   d.       All photos, videos, and other depictions associated with the account  
6 that depict child pornography defined in 18 U.S.C. § 2256;

7                   e.       Images associated with the account belonging to the Discord suspect  
8 account user;

9                   f.       Postings, communications, biographical information, or other  
10 information identifying the suspect account user and/or any other persons transmitting  
11 depictions of minors engaged in sexually explicit conduct, or attempts thereof, or  
12 evidencing the transmissions thereof;

13                   g.       Usage information evidence and communications between others to  
14 include communications to target minors for sexual exploitation (including when the  
15 suspect account opened a message or captured a screenshot);

16                   h.       Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20                   i.       Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22                   j.       Data related to linked services;

23                   k.       User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27                   l.       Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           m.     The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B3****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A3 **baezy\_#0000** ID **1052882529054642216** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A3 for the dates of **August 6, 2023, through August 8, 2023, UTC**<sup>8</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>8</sup> As detailed herein, August 6 through August 8, 2023, are the dates MV1, baezy\_#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A3, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control  
4 over the account;

5 b. Financial account information and account status history;

6  
7 c. Evidence indicating the targeting, communication, and solicitation of  
8 children to produce sexually explicit material;

9 d. All photos, videos, and other depictions associated with the account  
10 that depict child pornography defined in 18 U.S.C. § 2256;

11 e. Images associated with the account belonging to the Discord account  
12 user;

13 f. Postings, communications, biographical information, or other  
14 information identifying the account user and/or any other persons transmitting depictions  
15 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
16 transmissions thereof;

17 g. Evidence indicating how and when the Discord account was  
18 accessed or used, to determine the chronological and geographic context of account  
19 access, use, and events relating to the crime under investigation and to the Discord  
20 account owner;

21 h. Information about the content created or provided by the account,  
22 when the content was viewed and the metadata that is provided with the content;

23 i. Data related to linked services;

24 j. User attribution evidence identifying the account user's devices,  
25 software, sensors, operating version, advertising identifiers, installed applications, unique  
26 identifiers, browser data, time zone, wireless and mobile network connections to include  
27 numbers, providers, IP addresses, and data related thereto;

k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

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2 1. The identity of the person(s) who created or used the user ID,  
3 including records that help reveal the whereabouts of such person(s), and to establish  
4 dominion and control over the account during this time period.

5 This warrant authorizes a review of electronically stored information, communications,  
6 other records and information disclosed pursuant to this warrant in order to locate  
7 evidence, fruits, and instrumentalities described in this warrant. The review of this  
8 electronic data may be conducted by any government personnel assisting in the  
9 investigation, who may include, in addition to law enforcement officers and agents,  
10 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
11 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
12 custody and control of attorneys for the government and their support staff for their  
13 independent review.  
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**ATTACHMENT B4****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A4 **mayoxhen#0000** ID **711460293473075221** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A4 for the dates of **August 24, 2022, through August 29, 2022**, UTC <sup>9</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>9</sup> As detailed herein, August 24 through August 29, 2022, are the dates MV2, mayoxhen#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;



o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and



1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A4, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B5****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A5 **luna9967#0000 ID 895181087511298068** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A5 for the date of **July 23, 2022**, UTC <sup>10</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

d. Subscriber financial account information and account status history;

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<sup>10</sup> As detailed herein, July 23, 2022, through July 23, 2022, are the dates MV3, luna9967#0000, was in communication with PARK on Discord.

1 e. Images: All photos, videos, and other depictions associated with the  
2 account, in any format or media. Law enforcement will search these files and only seize  
3 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
4 demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
7 of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

8 g. Usage information detailing how the account interacted with Discord  
9 including which search queries the suspect account user submit;

10 h. Usage information detailing how the account communicated with  
11 other Discord users, such as their names, the time and date of your communications, the  
12 number of messages exchanged with other users, which other users exchanged messages  
13 with the account, and the account's interactions with messages (such as when the account  
14 opened a message or captured a screenshot);

15 i. Content information including information about the content created  
16 or provided by the account, such as if the recipient has viewed the content and the  
17 metadata that is provided with the content;

18 j. Device information documenting the devices used by the account to  
19 include information about the account's hardware and software (to include hardware  
20 model, operating system version, device memory, advertising identifiers, unique  
21 application identifiers, apps installed, unique device identifiers, browser type, language,  
22 battery level, and time zone);

23 k. Device information documenting device sensors, such as  
24 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
25 headphones connected;

26 l. Device information documenting the wireless and mobile network  
27 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

m. Device information to include device Phonebook data collected, and  
any unique identifiers for devices used to access the account;

n. Device information to include Camera and Photos collected from the  
account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A5, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

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7 c. Evidence indicating the targeting, communication, and solicitation of  
8 children to produce sexually explicit material;

9 d. All photos, videos, and other depictions associated with the account  
10 that depict child pornography defined in 18 U.S.C. § 2256;

11 e. Images associated with the account belonging to the Discord account  
12 user;

13 f. Postings, communications, biographical information, or other  
14 information identifying the account user and/or any other persons transmitting depictions  
15 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
16 transmissions thereof;

17 g. Evidence indicating how and when the Discord account was  
18 accessed or used, to determine the chronological and geographic context of account  
19 access, use, and events relating to the crime under investigation and to the Discord  
20 account owner;

21 h. Information about the content created or provided by the account,  
22 when the content was viewed and the metadata that is provided with the content;

23 i. Data related to linked services;

24 j. User attribution evidence identifying the account user's devices,  
25 software, sensors, operating version, advertising identifiers, installed applications, unique  
26 identifiers, browser data, time zone, wireless and mobile network connections to include  
27 numbers, providers, IP addresses, and data related thereto;

28 k. Evidence of the Discord account user's state of mind as it relates to  
29 the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B6****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A6 **prettygirl2#0000** ID **826123343622176809** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A6 for the dates **July 23, 2022, through August 3, 2022, UTC**<sup>11</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>11</sup> As detailed herein, July 23, 2022, through August 3, 2022, are the dates MV4, prettygirl2#0000, was in communication with PARK on Discord.



1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A6, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

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7 c. Evidence indicating the targeting, communication, and solicitation of  
8 children to produce sexually explicit material;

9 d. All photos, videos, and other depictions associated with the account  
10 that depict child pornography defined in 18 U.S.C. § 2256;

11 e. Images associated with the account belonging to the Discord account  
12 user;

13 f. Postings, communications, biographical information, or other  
14 information identifying the account user and/or any other persons transmitting depictions  
15 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
16 transmissions thereof;

17 g. Evidence indicating how and when the Discord account was  
18 accessed or used, to determine the chronological and geographic context of account  
19 access, use, and events relating to the crime under investigation and to the Discord  
20 account owner;

21 h. Information about the content created or provided by the account,  
22 when the content was viewed and the metadata that is provided with the content;

23 i. Data related to linked services;

24 j. User attribution evidence identifying the account user's devices,  
25 software, sensors, operating version, advertising identifiers, installed applications, unique  
26 identifiers, browser data, time zone, wireless and mobile network connections to include  
27 numbers, providers, IP addresses, and data related thereto;

28 k. Evidence of the Discord account user's state of mind as it relates to  
29 the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B7****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A7 **volietnce#0000 ID 678711470497726485** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A7 for the dates of **July 24, 2022, through July 28, 2022**, UTC <sup>12</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>12</sup> As detailed herein, July 24, 2022, through July 28, 2022, are the dates MV5, volietnce#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A7, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;



1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B8****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A8 **jo876543#0000 ID 906379051550248971** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A8 for the date of **July 31, 2022**, UTC<sup>13</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

d. Subscriber financial account information and account status history;

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<sup>13</sup> As detailed herein, July 31, 2022, is the date MV6, jo876543#0000, was in communication with PARK on Discord.

1 e. Images: All photos, videos, and other depictions associated with the  
2 account, in any format or media. Law enforcement will search these files and only seize  
3 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
4 demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
7 of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

8 g. Usage information detailing how the account interacted with Discord  
9 including which search queries the suspect account user submit;

10 h. Usage information detailing how the account communicated with  
11 other Discord users, such as their names, the time and date of your communications, the  
12 number of messages exchanged with other users, which other users exchanged messages  
13 with the account, and the account's interactions with messages (such as when the account  
14 opened a message or captured a screenshot);

15 i. Content information including information about the content created  
16 or provided by the account, such as if the recipient has viewed the content and the  
17 metadata that is provided with the content;

18 j. Device information documenting the devices used by the account to  
19 include information about the account's hardware and software (to include hardware  
20 model, operating system version, device memory, advertising identifiers, unique  
21 application identifiers, apps installed, unique device identifiers, browser type, language,  
22 battery level, and time zone);

23 k. Device information documenting device sensors, such as  
24 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
25 headphones connected;

26 l. Device information documenting the wireless and mobile network  
27 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

m. Device information to include device Phonebook data collected, and  
any unique identifiers for devices used to access the account;

n. Device information to include Camera and Photos collected from the  
account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A8, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B9****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A9 **Deleted User d2c0a72c#7499 ID 1003928511490302002** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A9 for the dates of **August 2, 2022, through August 6, 2022, UTC<sup>14</sup>:**

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>14</sup> As detailed herein, August 2, 2022, through August 6, 2022, are the dates MV7, Deleted User d2c0a72c#7499, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;



o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A9, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B10****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A10 **juliettqr#0000** ID **1002455100930916432** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A10 for the dates of **August 3, 2022, through April 19, 2023, UTC<sup>15</sup>**:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>15</sup> As detailed herein, August 3, 2022, through April 19, 2023, are the dates MV8, juliettqr#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A10, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B11****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A11

**oakley73728#0000 ID 901107917091143760** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A11 for the date of **August 3, 2022**, UTC<sup>16</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>16</sup> As detailed herein, August 3, 2022, is the date MV9, oakley73728#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A11, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B12****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A12 **sigsaftersex#0000** ID **944945896842485810** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A12 for the dates of **August 6, 2022, through October 26, 2022, UTC<sup>17</sup>**:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>17</sup> As detailed herein, August 6, 2022, through October 26, 2022, are the dates MV10, sigsaftersex#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;



o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and



1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A12, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B13****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A13

**princessvi0let#0000 ID 1005404868258840668** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A13 for the dates of **August 6, 2022, through May 14, 2023, UTC<sup>18</sup>:**

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>18</sup> As detailed herein, August 6, 2022, through May 14, 2023, are the dates MV11, princessvi0let#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A13, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B14****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A14 **Deleted User 1540e08b#6336 ID 953067175936135178** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A14 for the dates of **March 17, 2022, through April 2, 2022, UTC<sup>19</sup>**:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>19</sup> As detailed herein, March 17, 2022, through April 2, 2022, are the dates MV14, Deleted User 1540e08b#6336, was in communication with PARK on Discord.



1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A14, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6  
7 c. Evidence indicating the targeting, communication, and solicitation of  
8 children to produce sexually explicit material;

9 d. All photos, videos, and other depictions associated with the account  
10 that depict child pornography defined in 18 U.S.C. § 2256;

11 e. Images associated with the account belonging to the Discord account  
12 user;

13 f. Postings, communications, biographical information, or other  
14 information identifying the account user and/or any other persons transmitting depictions  
15 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
16 transmissions thereof;

17 g. Evidence indicating how and when the Discord account was  
18 accessed or used, to determine the chronological and geographic context of account  
19 access, use, and events relating to the crime under investigation and to the Discord  
20 account owner;

21 h. Information about the content created or provided by the account,  
22 when the content was viewed and the metadata that is provided with the content;

23 i. Data related to linked services;

24 j. User attribution evidence identifying the account user's devices,  
25 software, sensors, operating version, advertising identifiers, installed applications, unique  
26 identifiers, browser data, time zone, wireless and mobile network connections to include  
27 numbers, providers, IP addresses, and data related thereto;

28 k. Evidence of the Discord account user's state of mind as it relates to  
29 the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B15****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A15 **selena0562#5935** ID **359171244014174217** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A15 for the dates of **June 16, 2019, through July 5, 2019, UTC<sup>20</sup>**:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>20</sup> As detailed herein, June 16, 2019, through July 5, 2019, are the dates MV15, selena0562#5935, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A15, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;



1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B16****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A16 **Buttons#8174 ID 804463761603821578** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A16 for the dates of **April 6, 2021, through June 26, 2022**, UTC<sup>21</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>21</sup> As detailed herein, April 6, 2021, through June 26, 2022, are the dates MV16, Buttons#8174, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A16, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B17****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A17 **meisie#5714 ID 617385349693571129** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A17 for the dates of **September 3, 2019, through September 6, 2019, UTC<sup>22</sup>**:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>22</sup> As detailed herein, September 3, 2019, through September 6, 2019, are the dates MV17, meisie#5714, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;



o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A17, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B18****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A18

**\_moonplayz\_#0000 ID 474369899196710912** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A18 for the date of **August 27, 2021, UTC**<sup>23</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>23</sup> As detailed herein, August 27, 2021, is the date MV18, **\_moonplayz\_#0000**, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A18, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B19****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A19 **netz#4199 ID 535659168410107906** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A19 for the dates of **April 6, 2021, through April 12, 2021**, UTC<sup>24</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>24</sup> As detailed herein, April 6, 2021, through April 12, 2021, are the dates MV19, netz#4199, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A19, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B20****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A20 **charityy#0000 ID 544537243755479050** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A20 for the date of **April 6, 2021**, UTC<sup>25</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

d. Subscriber financial account information and account status history;

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<sup>25</sup> As detailed herein, April 6, 2021, are the dates MV20, charityy#0000, was in communication with PARK on Discord.

1 e. Images: All photos, videos, and other depictions associated with the  
2 account, in any format or media. Law enforcement will search these files and only seize  
3 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
4 demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
7 of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

8 g. Usage information detailing how the account interacted with Discord  
9 including which search queries the suspect account user submit;

10 h. Usage information detailing how the account communicated with  
11 other Discord users, such as their names, the time and date of your communications, the  
12 number of messages exchanged with other users, which other users exchanged messages  
13 with the account, and the account's interactions with messages (such as when the account  
14 opened a message or captured a screenshot);

15 i. Content information including information about the content created  
16 or provided by the account, such as if the recipient has viewed the content and the  
17 metadata that is provided with the content;

18 j. Device information documenting the devices used by the account to  
19 include information about the account's hardware and software (to include hardware  
20 model, operating system version, device memory, advertising identifiers, unique  
21 application identifiers, apps installed, unique device identifiers, browser type, language,  
22 battery level, and time zone);

23 k. Device information documenting device sensors, such as  
24 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
25 headphones connected;

26 l. Device information documenting the wireless and mobile network  
27 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

m. Device information to include device Phonebook data collected, and  
any unique identifiers for devices used to access the account;

n. Device information to include Camera and Photos collected from the  
account's device's camera and photos;



o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and



1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A20, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6  
7 c. Evidence indicating the targeting, communication, and solicitation of  
8 children to produce sexually explicit material;

9 d. All photos, videos, and other depictions associated with the account  
10 that depict child pornography defined in 18 U.S.C. § 2256;

11 e. Images associated with the account belonging to the Discord account  
12 user;

13 f. Postings, communications, biographical information, or other  
14 information identifying the account user and/or any other persons transmitting depictions  
15 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
16 transmissions thereof;

17 g. Evidence indicating how and when the Discord account was  
18 accessed or used, to determine the chronological and geographic context of account  
19 access, use, and events relating to the crime under investigation and to the Discord  
20 account owner;

21 h. Information about the content created or provided by the account,  
22 when the content was viewed and the metadata that is provided with the content;

23 i. Data related to linked services;

24 j. User attribution evidence identifying the account user's devices,  
25 software, sensors, operating version, advertising identifiers, installed applications, unique  
26 identifiers, browser data, time zone, wireless and mobile network connections to include  
27 numbers, providers, IP addresses, and data related thereto;

k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B21****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A21 **vars0n#0000 ID 486332388742529025** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A21 for the dates of **April 7, 2021, through July 1, 2021**, UTC<sup>26</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>26</sup> As detailed herein, April 7, 2021, through July 1, 2021, are the dates MV21, vars0n#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A21, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

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7 c. Evidence indicating the targeting, communication, and solicitation of  
8 children to produce sexually explicit material;

9 d. All photos, videos, and other depictions associated with the account  
10 that depict child pornography defined in 18 U.S.C. § 2256;

11 e. Images associated with the account belonging to the Discord account  
12 user;

13 f. Postings, communications, biographical information, or other  
14 information identifying the account user and/or any other persons transmitting depictions  
15 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
16 transmissions thereof;

17 g. Evidence indicating how and when the Discord account was  
18 accessed or used, to determine the chronological and geographic context of account  
19 access, use, and events relating to the crime under investigation and to the Discord  
20 account owner;

21 h. Information about the content created or provided by the account,  
22 when the content was viewed and the metadata that is provided with the content;

23 i. Data related to linked services;

24 j. User attribution evidence identifying the account user's devices,  
25 software, sensors, operating version, advertising identifiers, installed applications, unique  
26 identifiers, browser data, time zone, wireless and mobile network connections to include  
27 numbers, providers, IP addresses, and data related thereto;

k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B22****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A22 **Deleted User 0c25c2aa#5200 ID 555186377029844992** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A22 for the dates of **May 25, 2019, through June 30, 2019**, UTC<sup>27</sup>:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>27</sup> As detailed herein, May 25, 2019, through June 30, 2019, are the dates MV22, Deleted User 0c25c2aa#5200, was in communication with PARK on Discord.



1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
12 opened a message or captured a screenshot);

13 i. Content information including information about the content created  
or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
18 battery level, and time zone);

19 k. Device information documenting device sensors, such as  
accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A22, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;

1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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**ATTACHMENT B23****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A23 **semyetra#0000** ID **272623738695188481** is within the possession, custody, or control of Discord, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each user ID listed in Attachment A23 for the dates of **April 9, 2018, through May 30, 2021, UTC<sup>28</sup>**:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, and all associated accounts;

c. Customer service records All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

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<sup>28</sup> As detailed herein, April 9, 2018, through May 30, 2021, are the dates MV23, semyetra#0000, was in communication with PARK on Discord.

1 d. Subscriber financial account information and account status history;

2 e. Images: All photos, videos, and other depictions associated with the  
3 account, in any format or media. Law enforcement will search these files and only seize  
4 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the account user and/or any other persons transmitting depictions  
of minors engaged in sexually explicit conduct or evidencing the transmissions thereof;

7 g. Usage information detailing how the account interacted with Discord  
8 including which search queries the suspect account user submit;

9 h. Usage information detailing how the account communicated with  
10 other Discord users, such as their names, the time and date of your communications, the  
number of messages exchanged with other users, which other users exchanged messages  
11 with the account, and the account's interactions with messages (such as when the account  
opened a message or captured a screenshot);

12 i. Content information including information about the content created  
13 or provided by the account, such as if the recipient has viewed the content and the  
14 metadata that is provided with the content;

15 j. Device information documenting the devices used by the account to  
16 include information about the account's hardware and software (to include hardware  
model, operating system version, device memory, advertising identifiers, unique  
17 application identifiers, apps installed, unique device identifiers, browser type, language,  
battery level, and time zone);

18 k. Device information documenting device sensors, such as  
19 accelerometers, gyroscopes, compasses, microphones, and whether the account has  
20 headphones connected;

21 l. Device information documenting the wireless and mobile network  
22 connections, to include mobile phone number, service provider, IP address, and signal  
strength;

23 m. Device information to include device Phonebook data collected, and  
24 any unique identifiers for devices used to access the account;

25 n. Device information to include Camera and Photos collected from the  
26 account's device's camera and photos;

o. Location information about the account's precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses;

p. Information collected by cookies and other technologies to include information when the account interacted with services Discord offers through one of its partners, such as advertising and commerce features;

q. Log information such as:

- i. details about how the account used Discord services;
- ii. device information, such as the account's web browser type and language;
- iii. access times;
- iv. pages viewed;
- v. IP address;
- vi. identifiers associated with cookies or other technologies that may uniquely identify the account's device or browser; and
- vii. pages the account visited before or after navigating to Discord's website.

r. Information collected from Third Parties about the account from other users, Discord affiliates, and third parties to include if the account linked it's Discord account to another service (like Bitmoji or a third-party app) or if another user uploads their contact list, Discord may combine information from that user's contact list with other information Discord have collected about the account.

Discord is hereby ordered to disclose the above information to the government within **14 days** of issuance of this warrant.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. Section 2422(b), Enticement of Children and

1 Attempted Enticement of Children, including, for each user ID identified on Attachment  
2 A23, information pertaining to the following matters:

3 a. Evidence identifying the person(s) exercising dominion and control over  
4 the account;

5 b. Financial account information and account status history;

6 c. Evidence indicating the targeting, communication, and solicitation of  
7 children to produce sexually explicit material;

8 d. All photos, videos, and other depictions associated with the account  
9 that depict child pornography defined in 18 U.S.C. § 2256;

10 e. Images associated with the account belonging to the Discord account  
11 user;

12 f. Postings, communications, biographical information, or other  
13 information identifying the account user and/or any other persons transmitting depictions  
14 of minors engaged in sexually explicit conduct, or attempts thereof, or evidencing the  
15 transmissions thereof;

16 g. Evidence indicating how and when the Discord account was  
17 accessed or used, to determine the chronological and geographic context of account  
18 access, use, and events relating to the crime under investigation and to the Discord  
19 account owner;

20 h. Information about the content created or provided by the account,  
21 when the content was viewed and the metadata that is provided with the content;

22 i. Data related to linked services;

23 j. User attribution evidence identifying the account user's devices,  
24 software, sensors, operating version, advertising identifiers, installed applications, unique  
25 identifiers, browser data, time zone, wireless and mobile network connections to include  
26 numbers, providers, IP addresses, and data related thereto;

27 k. Evidence of the Discord account user's state of mind as it relates to  
the crimes under investigation;



1           1.       The identity of the person(s) who created or used the user ID,  
2 including records that help reveal the whereabouts of such person(s), and to establish  
3 dominion and control over the account during this time period.

4 This warrant authorizes a review of electronically stored information, communications,  
5 other records and information disclosed pursuant to this warrant in order to locate  
6 evidence, fruits, and instrumentalities described in this warrant. The review of this  
7 electronic data may be conducted by any government personnel assisting in the  
8 investigation, who may include, in addition to law enforcement officers and agents,  
9 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
10 this warrant, HSI may deliver a complete copy of the disclosed electronic data to the  
11 custody and control of attorneys for the government and their support staff for their  
12 independent review.  
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